DOCUMENT RESUME

ED 185 242 CE 023 909

TITLE	Equal Opportunities for Women.
INSTITUTION	Organisation for Economic Cooperation and Development, Paris (France). Directorate for Manpower and Social Affairs.
PUB DATE	79
NOTE	221p.: Not available in paper copy due to thin, small type.
AVAILABLE FROM	OECD Publications, 2, rue Andre-Pascal, 75775 Paris Cedex 16, France ($10.00) Paris Cedex 16, France ($10.00)
EDRS PRICE	MF01 Plus Postage. PC Not Available from EDRS.
DESCRIPTORS	Cross Cultural Studies; Day Care Centers; Equal Education; Equal Opportunities (Jobs); *Females; *Flexible Working Hours; Foreign Countries; *Global Approach; *Labor Market; *Salary Wage Differentials; Womens Education
IDENTIFIERS	*Social Security

ABSTRACT

A study of the opportunities for women in member countries of the Organisation for Economic Cooperation and Development (OECD) is reported along with suggested policy directions for government programs. Focus is on identifying the gaps that have appeared or grown wider in recent decades between, on one hand, existing laws, policies, and institutions, and, on the other, the aspirations of women and the reality of their working lives. A chapter is devoted to each of the following topics: (1) consequences of growing participation and changing roles of women in the labor market, (2) the problems of achieving equality of pay and employment, (3) the influences of education and training, (4) flexibility of working time and child care arrangements for working parents, and (5) the evolution of social security legislation to deal in a consistent way with men and women. In the last chapter, the main trends of member countries are identified, and measures, programs, or policies which might help member countries towards the solutions of problems facing them are outlined. (MEK)

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EQUAL OPPORTUNITIES FOR WOMEN

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PARIS 1979

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- to contribute to sound economic expansion in Member as well as non-member countries in the process of economic development;
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PREFACE

This Report has been prepared by the Working Party on the Role of Women in the Economy, established by the OECD Manpower and Social Affairs Committee at the end of 1974.

The content of the Report is summarised in its introduction. It deals with many of the consequences of the growing participation and changing roles of women in the labour market, the problems of achieving equality of pay and employment, the influence of education and training, flexibility of working time and child-care arrangements for working parents, and the evolution of social security legislation to deal in a consistent way with men and women.

In the last part of this Report, the main trends in Member countries are identified and measures, programmes and policies which might help Member countries towards the solution of problems facing them are outlined.

The conclusions set out in the Report do not however bind the Member governments.

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INTRODUCTION

In 1973, the United States Government invited the Organisation for Economic Cooperation and Development to hold an international meeting of experts in Washington D.C., for the purpose of examining the economic and social repercussions of the growing participation of women in the labour market.

In preparation for this meeting, ten Member countries (1) submitted national reports on the basis of an outline proposed by the Secretariat. A summary was then compiled for examination by the group of experts (2). This first report identified a number of interrelated areas, such as education and training, conditions of employment, child care and social security, that would require further examination, before conclusions could be drawn and policy directions formulated for government programmes and measures.

The group of experts proposed that OECD should create a Working Party to make an in-depth study of each of these areas and report to the Manpower and Social Affairs Committee. A Working Party on the role of women in the economy was set up in 1974 and has held four meetings to analyse the various components of its mandate. The present report is the outcome of these four meetings of the Working Party.

Its mandate may be summarised as follows:

- to examine and review employment and career opportunities, conditions of work and remuneration for women. Consequently to investigate occupational segregation, which excludes women from certain job opportunities and discriminatory practices in hiring, promotion and training based on protective legislation and regulations or on traditional attitudes, and to evaluate the economic and social factors, including career patterns, that determine women's earnings and benefits and lead to inequalities;

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(1) Australia, Belgium, Canada, Denmark, Finland, France, Italy, Japan, Sweden and the United States.

(2) After approval by the Manpower and Social Affairs Committee, this document was published by OECD in 1975 as The Role of Women in the Economy.

- to investigate sex discrimination in areas connected with the preparation of the potential female labour force, such as education - including recurrent education - and training;

- to examine the possibilities for parents to participate fully in the labour market with regard to the availability of adequate child care facilities, flexibility of working hours and leave, and normal career progression;

- to review and harmonize existing social security systems, fiscal legislation and administrative practices which result in differential or inequitable treatment of women; and

- to identify gaps in statistical reporting of the status of women in Member countries and recommend improvements designed to inform policy makers.

Underlying the discussions of the Working Party has been the desire to accelerate the implementation of de jure and de facto equality of men and women in the economy and to promote a more even sharing between them of roles and responsibilities in family and economic life.

In general, behaviour patterns, habits and life styles have changed more rapidly than laws, institutions and policies. Different countries, of course, have different points of view and these differences have been reflected in this report. Its basic aim is to bring out, in the various areas considered, the gaps that have appeared or grown wider in recent decades between, on one hand, existing laws, policies and institutions and, on the other, the aspirations of women and the reality of their working lives. With this aim in view, the Working Party suggests policy directions that could further the integration of women in society on equal terms with men, both in matters directly conncected with the labour market, that is, education, training, pay and employment conditions, which form the first part of the report, and in matters that enable equality in these fields to be effectively enjoyed, namely, time flexibility, child care and social security.

The questions covered in the present report, however, form only the basic essential conditions of progress towards equality of women in employment. There are serious barriers to economic opportunity in other fields, which are not treated here and which require further study. Some of these are indicated in the closing section of the report.

Chapter I, "The Changing Position of Women in the Labour Market", first describes the social and economic changes of the past few decades that have made employment more necessary and more feasible for women and have led to their increasing participation in the labour force. Women's growing economic importance and the demand

for equal treatment and better employment opportunities have been influential in the development of public policies intended to improve their situation in the labour market.

Current labour force participation rates for women in the OECD countries are compared with those of men and the effects of the 1974-75 recession are discussed. While participation rates for women vary among countries, their share of total employment over the past fifteen years has increased in most countries - in some, dramatically - and declined in only a few. Projections of future trends to 1990 indicate that in almost all countries, participation rates will continue to increase. This long-term upward trend can be attributed, among other things, to such factors as structural changes in the supply of labour and sectoral shifts in employment opportunities. Participation rates have increased particularly rapidly for certain segments of the potential female labour supply: married women, women in the prime childbearing age, and middle-aged women with grown children.

Data from a number of OECD countries document the sectoral and occupational segregation of women in employment. An analysis of these data shows that the sectoral imbalance is far outweighed in importance by the imbalance in sub-sectors and occupations. Women are concentrated in a narrower range of jobs than men, and the jobs they fill are lower paid, less skilled, and require less education and training. The reasons for the persistence of this sex segregation and the division of the labour market are enumerated.

The reasons why women participate in gainful employment are as varied as those for men. The relative influence of various socio-economic factors as determinants of the increasing labour force participation of women is discussed, and six of the most important ones are identified and summarised.

Finally, the implications of current labour market developments for socio-economic policies affecting women are outlined. It is pointed out that public policy options put forward in subsequent chapters of the report are based on recognition of the need for differential policies for women in order to ensure effective equality for all citizens.

Chapter II, "Women in Education and Training", finds that the main source of inequality in education stems from role prejudice in society which the educational system reflects. The interrelations between educational policies, practices and choices and the opportunities of women in the labour market are then examined.

The fact that sex has a special influence on educational and vocational choices is illustrated by the differences in years of schooling and in the nature of that schooling. In many countries,

female students have increased their number of years of full-time education and the gap in participation rates between young men and young women has narrowed. However, there is still a strong tendency for students to follow educational courses on the basis of existing sex stereotypes which lead to conventional "men's" or "women's" occupations.

An examination of policy trends in four countries describes approaches to change within the educational system and relates these changes to other areas of public policy. Developments in secondary and higher education, labour market training and adult education are set out, illustrating the fact that the main direction of policy goes beyond the elimination of ostensible differences in access of men and women to educational programmes. Positive measures are also being taken to encourage women to prepare for occupations in which they are under-represented.

Finally, the implications for a strategy of equality in education are discussed. The components of educational policy making a potentially important contribution to such a strategy include structural changes in institutional arrangements; revision of curricula; admission policies and practices; guidance and counselling services; greater flexibility in the education system and increased opportunities for recurrent education especially for women whose secondary education may be incomplete. Non-educational policies and practices with particular relevance to the status of women in education include those related to equality in the labour market, including the teaching profession, policies to reduce role prejudice in society, and policies to increase the volume and quality of public child-care facilities. The need is recognised for coordination between educational and non-educational policies because of the inter-relatedness of changes in all these policy fields in achieving the goal of equality in education. Legal protection of women's rights to equal access needs to be supplemented by positive programmes to encourage women to remain in education, to re-enter it later in life, and to choose non-traditional fields of education.

Chapter III, "Achieving Equality in Pay and Employment", concentrates on the variety of policies adopted in a number of Member countries which act directly on conditions of employment. It is recognised that these measures cannot be effective in isolation, but must be complemented by measures to achieve greater equality of the sexes in other areas of social and economic life.

18. Inequality continues to exist in pay, in spite of a long history of effort to eliminate sex differentials. It exists too in the employment of most women in a limited range of occupations. A survey of the application of the principles of equality as set out

in international instruments and in the constitutions and legislation of Member countries shows the existence of important differences. Ways of defining the right to equal pay for equal work vary, and in some cases have caused difficulties of application. Even greater differences occur in the principles of employment equality. International instruments show a development of the concept, which has become both wide - including, for example, equal access to training, placement and non-traditional occupations - and precise in its demands concerning pay, treatment and redress. It is no longer considered enough to guarantee equal pay or equal opportunity narrowly, in the sense of a notional equality of access or opportunity. The combination of ingrained attitudes, past discrimination and traditional employment practices has discriminatory effects, and positive measures are required to overcome them.

This concept is reflected in the policies of certain Member countries, but not yet in all. A number are currently revising their legislation and other policies in the direction of achieving equality of result. Even where the recognised principles and aims of policy are the same, great variations exist in practice. In part, these reflect different conditions, such as the degree of unionisation or the constitutional structure. An examination of a wide range of Member countries brings out the differences of emphasis placed on collective bargaining and legislation, and on supplementary action by the public authorities or independent bodies in education, persuasion and conciliation. A survey of the two main instruments of policy, collective bargaining and legislation, shows that both can be effective, but that the degree of effectiveness varies. An examination of the existing machinery in certain countries, especially that for enforcing equality laws, brings out the advantages and disadvantages that have emerged through experience and some of the modifications that have been made in consequence.

Although differences of aim, and particularly of method, remain great among Member countries, there is an observable evolution towards an effective mix of policies in several of them. Here, similarities in policies are increasing, especially as regards legislation and positive action, even in countries whose conditions are widely different. It is for this reason that the development, through experience, of certain principles and modes of action that prove effective, can be of general interest to Member countries in the formulation and improvement of their own policies to achieve equality in pay and employment.

The introduction to Chapter IV, "Time Arrangements", describes how and why flexible time arrangements can meet the new needs of the increasing number of workers who combine family and occupational responsibilities.

Various types of time arrangements are reviewed, with their consequences for workers, their families and the economy. These arrangements include the unbroken working day; the flexible working hours system; permanent part-time employment; and the compressed working week. The question of staggered holidays is also discussed. Finally, with reference to employment equality, parental leave, care of children, recurrent education and retirement, the benefits of life-long flexible allocation of time for all and of an eventual reduction of daily working hours are surveyed.

It is concluded that greater flexibility in time arrangements could help create the opportunity for a more effective distribution of economic, professional, family, social and political roles between the sexes, as well as enhancing the quality of life for all. To achieve these ends, the need is stressed for coordination of labour, education and social policies, as well as for various provisions such as financial aid, non-discrimination on grounds of age, the regulation of part-time employment, and appropriate guidance, training programmes and aid for men and women re-entering the labour market.

Chapter V, "Child-Care for Working Parents", begins with a brief historical review of OECD's concern with and work in this field.

A section on child care and the changing role of women examines the implications of the traditional assumption that women have primary responsibility for the care of home and children. While attitudes are gradually changing and both parents are increasingly sharing responsibilities, the fact remains that when mothers work outside the home they in fact carry a double load. The goal of equality between the sexes therefore involves changes in men's conditions and life patterns as well as women's.

The existing supply of child-care facilities is examined for children under three, children from three years to compulsory school age, and young primary school children before and after school hours and during school holidays. The gap between supply and demand for facilities has led to the establishment of priorities for the use of existing facilities. Working parents often make alternative arrangements, due to the shortage of places in public care facilities or for other reasons.

As national attitudes vary towards the division of responsibility between families and the state for the raising and well-being of children, so do different countries' approaches to child-care policy, and consequently to the concept, content and organisation of care. The structure of organised child-care follows three main patterns, whose characteristics are outlined. Various approaches to financing are summarised.

A section on care of pre-school children and the issue of child development summarises some of the current arguments in the as yet unresolved controversy concerning the effects of institutional and other care arrangements on the welfare and development of young children. The factors governing the quality of child-care services are discussed. The role of the school system is examined, for example, with regard to the additional services it might be expected to provide in the form of extracurricular programmes and care in out-of-school hours and during holidays. Another section of the chapter is devoted to adjustments in the conditions of working life to facilitate child-care for working parents. Included is an examination of welfare supports and social insurance benefits connected with maternity and paternity leave for birth and the care of sick children.

Stress is laid on the need for measures to bridge the gap between supply and demand for child-care facilities, especially for certain age groups, and it is recommended that in the allocation of resources high priority should be given to the provision of good facilities that maximise equal opportunity both for children to develop under optimal conditions and for parents to participate in gainful employment. The economic implications of quantity and quality decisions are evoked and the need for priorities in meeting policy objectives is underlined. Finally, a number of policy issues are enumerated and areas identified where further research is necessary to provide information for policy-makers.

Chapter VI, "Social Security", is based on information provided by fifteen Member countries. It reviews the most important aspects of social security systems which in various countries have not kept pace with social and economic change and progress towards equality between the sexes, and have thus led to inequality of treatment for women. Examples are given of the solutions applied or being discussed in a number of Member countries.

The main concerns on which the chapter focuses are identified: 1) how to integrate into earning-related systems, women who either do not participate in the labour market or who leave it for long periods in order to devote themselves to the care of children in the home; 2) the inequities among different groups in the population (men and women; one-earner and two-earner couples; single persons and married people; earning and non-earning women, etc.) that are built into many existing social security systems. Three factors are identified as putting women at a disadvantage in social security systems: inequality in employment and earnings, interruption of employment, and change in marital status for those dependent on rights derived from their spouses. Another source of

potential inequity is the fact that social security covers in some cases only the individual who is engaged in a gainful activity, and in others the married couple or the family unit.

A section on sources of entitlement to benefits expands on the problem of combining rights derived from employment with the rights of women who spend part or all of their lives in unpaid work in the home and receive low earnings when they are in employment. The consequences of low earnings and discontinuous careers in earnings-related systems are pointed out and the solutions adopted or envisaged by some countries are enumerated.

The fact that the concept of "dependence" is increasingly challenged by family members who wish to be treated as individuals has a number of implications for social security systems whose elements no longer correspond to the changing circumstances of family life.

Various sections of the chapter deal with present coverage and measures taken or envisaged in various countries relating to employment; accident, sickness and disability insurance; persons living alone (widows, widowers, divorcees) and retirement.

In conclusion, a number of possible approaches to the problem of unequal treatment of women and men in existing social security systems are indicated. These are drawn from among the major reforms and innovations now in practice or under consideration in Member countries and are accompanied by a summary of their respective advantages and disadvantages. Problems of equity connected with the various alternatives are evoked, as well as cost and benefit considerations. The widespread need for a re-examination of the basic principles underlying the eligibility requirements, benefit structure and financing arrangements of many social security systems is stressed, as well as the need for coordination of reforms in social security with other elements of social policy.

I

THE CHANGING POSITION OF WOMEN IN THE LABOUR MARKET

ASPECTS OF CHANGE

Social change in the industrialised countries has been remarkable during the past few decades for both its pace and scope. Nowhere is it more important than in the changing role of women throughout society and especially in the labour market. There are many contributory factors which vary in significance in different countries. It is impossible to attempt to rank these factors by priority. Among them are educational opportunities for both women and men and the increased levels of income enjoyed by most families. Both these factors contribute to rising levels of expectation, not only in terms of individual fulfilment as it relates to work but also in terms of improved material standards of living. Scientific and technological advances, particularly in communications and transportation, as well as changes in managerial modes, have deeply affected the way people live and work. The effects are seen in increased urbanisation of the industrialised countries, shifting patterns of residence and ultimately in changing life styles and patterns of family structure.

Social adjustments that are resulting include shifts in the age of marriage, improved family planning, smaller family size and the increasing presence of women of all ages in the labour force. For many women the interrelated social developments of recent years have increased the possibilities for paid employment and made such employment more desirable and necessary. For many, especially the increasing number of women who provide the chief financial support for themselves and their families, employment is essential.

Accompanying the changing role of women is the changing attitude of society as a whole towards women. The trend towards greater participation of women in the labour force and the growing economic importance of women in modern society cannot be dissociated from the rising demand for equal treatment and equal employment opportunities. Although for many years women's organisations have worked with varying degrees of success to improve the status of women in the economy, in recent years this effort has

taken new forms and gained broader support. In many Member countries women have now assumed an increasingly active role in politics and administration and have been influential in the development of public policies intended to improve the situation of women in the labour market. These policies, while clearly a response to changes already taking place, can have a double effect. As improvements for women are brought about, the trend towards increased labour force participation is strengthened. And as more women enter the labour force, attitudes are modified further, encouraging still greater participation.

This chapter examines the past and present extent and character of women's participation in the labour force as well as indicated trends for the future, and it offers possible explanations for recent changes. National differences are also explored and analysed. Finally, the chapter reviews the implications of these labour market developments for social policies as they affect women.

CURRENT LABOUR FORCE PARTICIPATION RATES IN OECD COUNTRIES

Although the extent to which women currently participate in the labour force varies among OECD countries, with a few notable exceptions the range of variation is not great. As seen in Table 1 the rate of labour force participation of women averaged 46.2 per cent in 1975. The OECD comparative rates for both men and women are based on the number of all persons in the labour force expressed as a percentage of the population aged 15-64. Since both men and women under 15 and over the age of 64 can be found in the labour force, the percentages given here may be overstated, but the degree of overstatement will most likely be slight.

Among OECD countries, a group of Nordic nations (Denmark, Finland and Sweden) show higher participation rates for women, with Sweden the highest at 67.6 per cent. In contrast women are much less active in the labour force in Greece, Ireland, Italy, Portugal and Spain, where participation rates are around 30 per cent. For the remaining OECD countries, the female participation rate averages 48.7 per cent, with France, Japan, the United Kingdom and the United States having the highest rates and Germany the lowest among this middle-range group of countries.

For purposes of comparison Table 1 also shows the 1975 labour force participation rates for men for OECD countries. In the case of men, variations among countries are not as great as among women. Some variations between countries, however, are notable. For example,

Table 1

LABOUR FORCE PARTICIPATION RATES OF WOMEN AND MEN
(Female and Male Labour Force as a Percentage of the Respective Female or Male Population Aged 15-64) 1975

(Percentages)

Country	Women	Men
Australia	48.5	88.8
Austria	48.0	84.4
Belgium	43.9	83.8
Canada	50.0	86.2
Denmark	63.5	89.8
Finland	65.6	79.7
France	56.5	84.4
Germany	48.5	85.7
Greece	30.8	82.7
Iceland	45.1	93.9
Ireland	33.5	92.1
Italy	30.7	81.2
Japan	51.7	89.6
Luxembourg	31.1	85.5
Netherlands	26.9 a	83.9 a
New Zealand	39.0	88.0
Norway	53.3	85.9
Portugal	32.0	94.4
Spain	32.5	87.6
Sweden	67.6	89.2
Switzerland	54.6	94.6
Turkey	53.2	92.8
United Kingdom	55.3	91.5
United States	53.1	85.3
Yugoslavia	46.4	85.4
Average	46.2	87.7

a = Labour force figures expressed in man-years.

Source: OECD, Manpower and Social Affairs Committee: Demographic Trends: Their Labour Market and Social Implications, Annex 2. (Mimeographed document).

Finland which has a particularly high rate for women reports the lowest participation rate for men with only 79.7 per cent in the labour force, while several countries reach figures of over 90 per cent.

The 1974-75 recession had a mixed effect on the participation rates of both women and men in the fifteen selected countries. In ten countries the participation rate for men declined, while in the remaining five the rate either remained stable or increased very slightly. In part this behaviour was merely representative of the long-term decline in the participation rates of men, but it may also indicate in some countries a certain amount of discouragement and withdrawal from the labour force, for example through premature retirement, not unexpected in periods of high unemployment. The impact of the recession on women was at the beginning of the recession in certain sectors and regions less severe than for men. This might reflect longer-term trends in women's labour force activity, but also involves other factors operating during the recession, such as the need to protect family living standards in a period of inflation, the availability to women of lower paid work, etc. These factors are discussed in greater detail below (1).

The relationship between women and the labour market is measurable not only in terms of the proportion of all women who are working or looking for employment, but also in terms of the relative share of the labour force that is represented by women. Table 2 presents data on this subject, giving the most recent information on women as a percentage of the total labour force in seventeen countries, and providing comparison with earlier years. It can be seen that by the mid-seventies women accounted for 37 per cent of the total labour force of the selected OECD countries. This represented an average increase of four percentage points over women's share of employment in the mid-sixties. In some countries such as Australia, Canada, Denmark, Norway, Sweden, the United Kingdom and the United States, the gain by women in the total share of jobs was particularly strong while in a few, notably Greece, Italy and Japan, there was an actual decline in the proportion of women in employment. These differences can in part be attributed to the decline in the number of workers engaged in agriculture, the extension of the length of education for both sexes, and also to the fact that many women had not yet been trained to take the job opportunities available in urban centres.

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(1) For further analysis of the impact of the recession, see The 1974-75 Recession and the Employment of Women. OECD, Paris, 1976.

Table 2

WOMEN AS A PERCENTAGE OF CIVILIAN EMPLOYMENT IN SEVENTEEN COUNTRIES

Country	Year	%	Year	%	Difference
Australia	1964	28.2	1975	34.2	6.0
Austria	1968	38.4	1975	38.4	-
Belgium	1963	31.1	1975	34.4	3.3
Canada*	1963	28.4	1976	36.9	8.5
			1977	37.0	8.6
Denmark	1965	34.8	1975	41.6	6.8
Finland	1964	44.0	1975	46.8	2.8
France	1968	35.2	1975	37.2	2.0
Germany	1963	36.9	1975	37.7	0.8
Greece	1961	32.3	1971	27.5	-5.1
Italy	1964	28.2	1975	28.1	-0.1
Ireland	1966	26.6	1975	27.4	0.8
Japan	1964	39.8	1975	37.4	-2.4
New Zealand	1964	26.1	1975	30.4	4.3
Norway	1963	29.6	1975	37.4	7.8
Sweden	1964	36.7	1975	42.3	5.6
United Kingdom	1964	34.3	1975	38.8	5.5
United States	1963	34.1	1975	39.6	5.5

* Canadian figures from Statistics Canada, Labour Force Survey

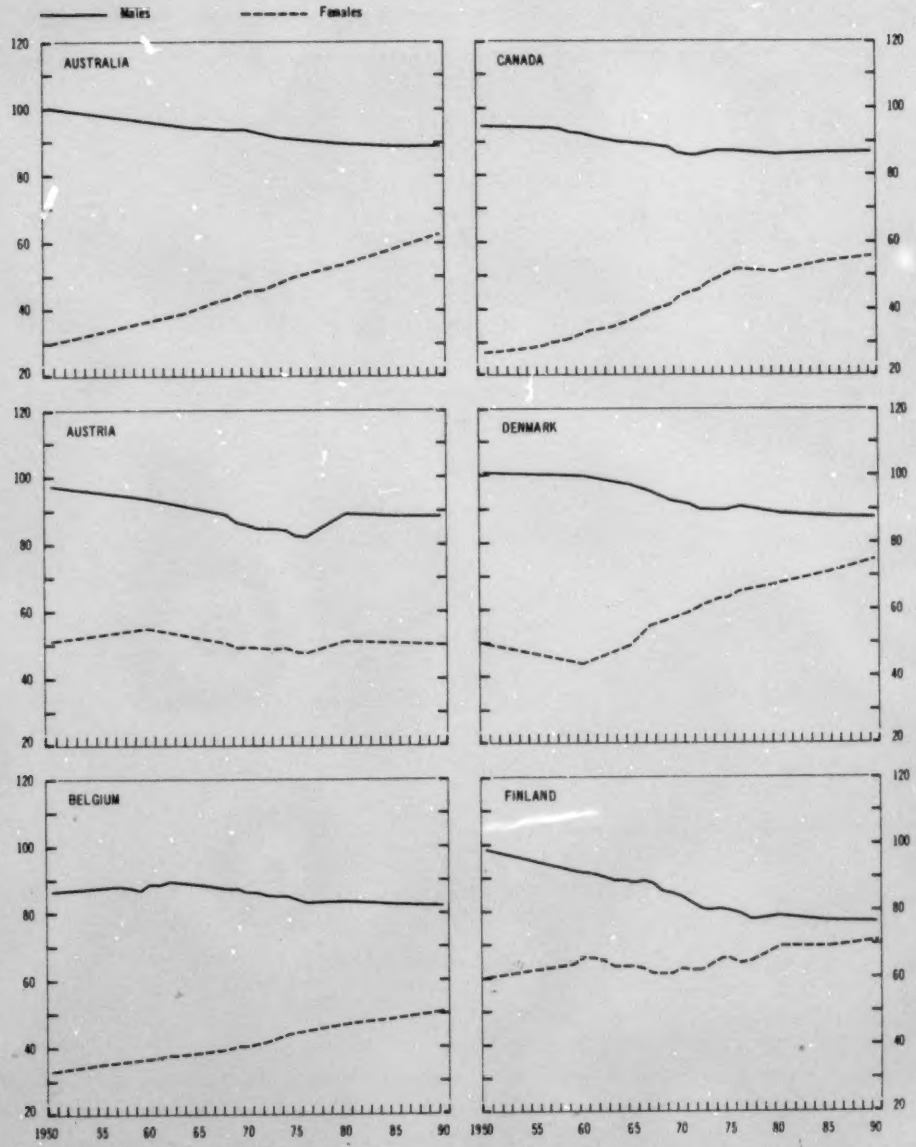
Source: OECD Labour Force Statistics, 1963-1974, Paris, 1976.

Trends in Labour Force Participation

In most OECD countries the increase in the labour force participation of women is part of a longer term trend. Graph 1 indicates that the participation rate of women in the labour force has been rising steadily throughout the post-war period in most OECD countries, although it has decreased somewhat in Austria, Greece, Iceland, Japan, Luxembourg and Yugoslavia. In Italy, where there was a decline between 1960 and 1970, the rate has now started to rise again. The Netherlands shows a consistently lower participation rate than most OECD countries, and since 1970 has had the lowest rate among all OECD countries. However, the Netherlands Authorities have since provided the Secretariat with actual numbers of women and not man-years in the labour force and the following graph is based on this new information which shows a slight increase in female participation.

Graph 1 *

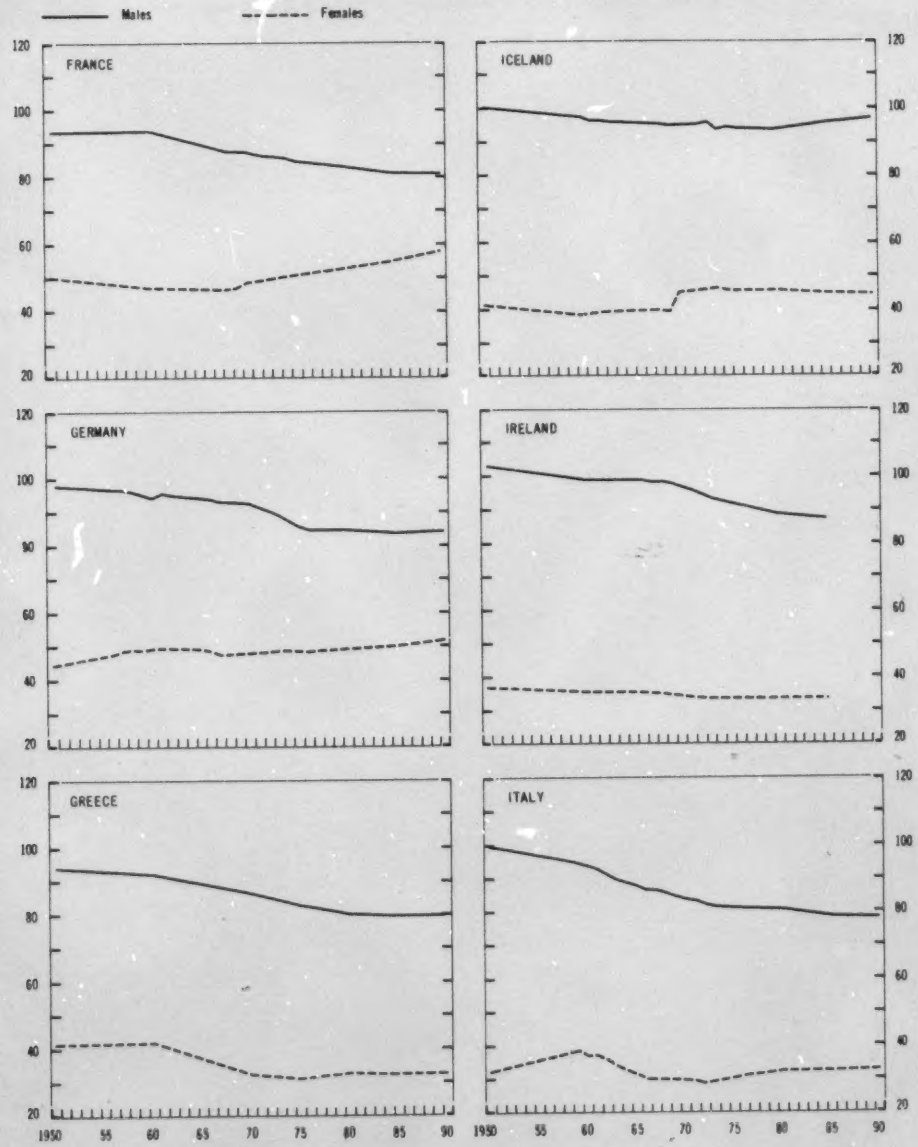
MALE AND FEMALE LABOUR FORCE OF ALL AGES DIVIDED BY POPULATION AGED 15-64



* These graphs have been updated on the basis of new information provided in 1978 by Member countries.

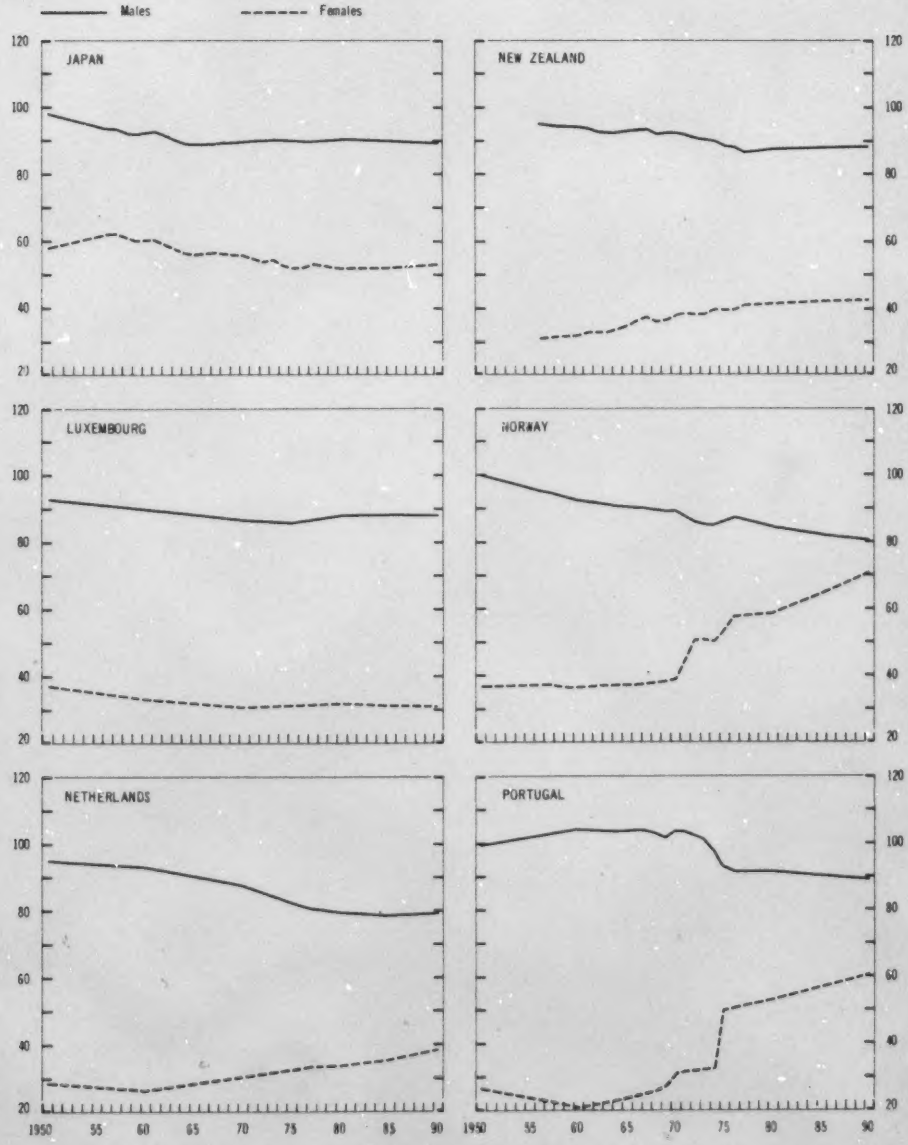
Graph 1 (contd.)

MALE AND FEMALE LABOUR FORCE OF ALL AGES DIVIDED BY POPULATION AGED 15-64



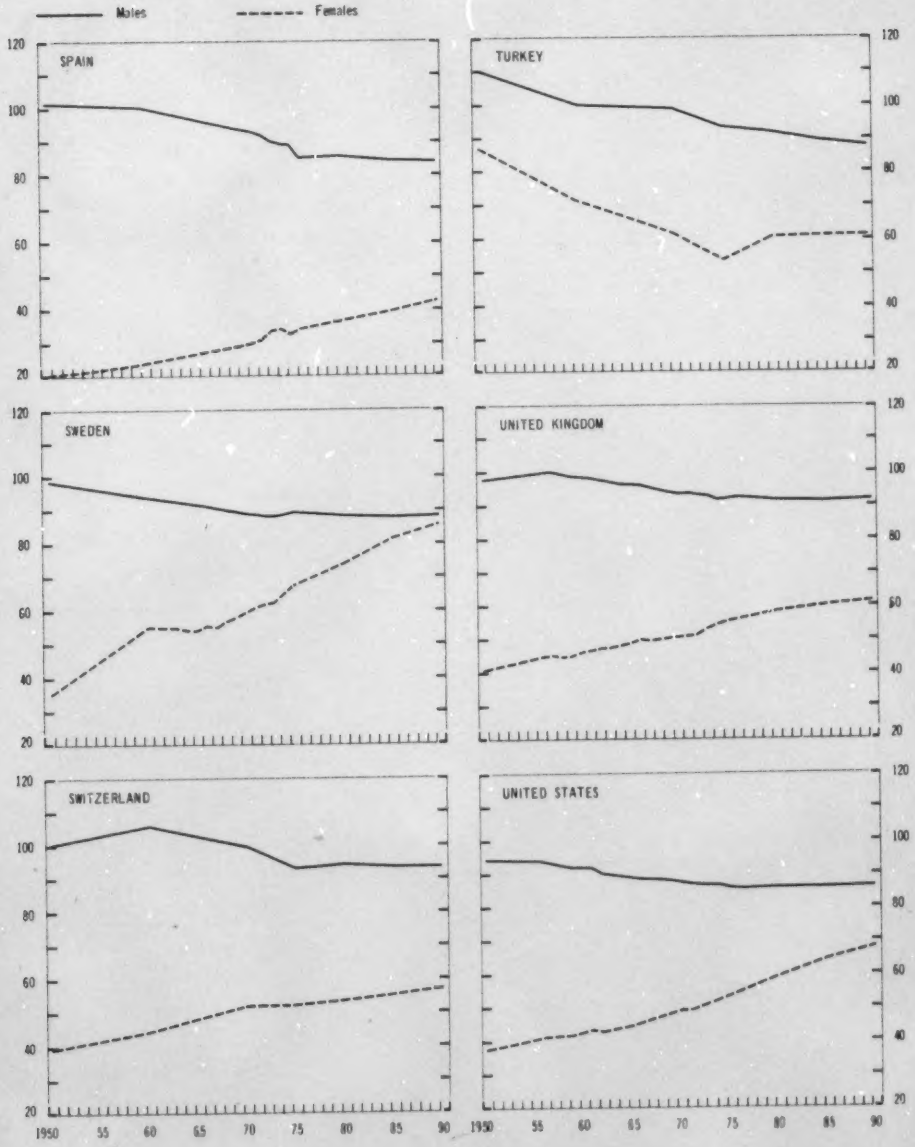
Graph 1 (contd.)

MALE AND FEMALE LABOUR FORCE OF ALL AGES DIVIDED BY POPULATION AGED 15-64



Graph 1 (contd.)

MALE AND FEMALE LABOUR FORCE OF ALL AGES DIVIDED BY POPULATION AGED 15-64



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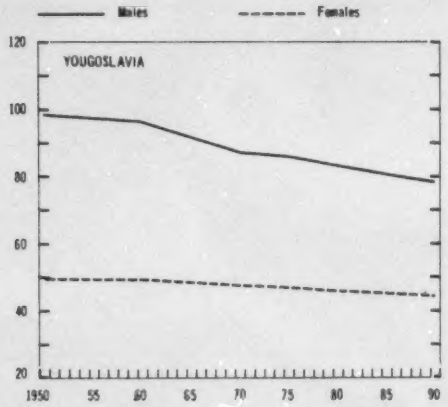
Graph 1 (contd.)

MALE AND FEMALE LABOUR FORCE OF ALL AGES DIVIDED BY POPULATION AGED 15-64



Projections for the future indicate that in almost all countries participation rates for women will increase (1). The national projections (Graph 1) indicate that in some countries, notably Japan, the United Kingdom and the United States, the dramatic increases in the female labour force participation rates have already occurred, and present rates are expected to increase only slightly by 1990. In contrast, the Nordic countries, especially Denmark and Sweden, project a further substantial rise in their already high rates. A few countries project decreases in the female participation rate between the present time and 1990. These are Iceland, Luxembourg, the Netherlands and Yugoslavia. The projected declines, however, are very small.

The extent and timing of these trends in the supply of female labour obviously vary from country to country. In some countries the rate of women's participation may begin to level off over the next ten to fifteen years, while in others the period of rapid growth may not yet have occurred, and still others might reach a stable level. In many of the OECD countries the great thrust of women into the labour force came at a time when wage rates for women were still much lower than those of men and when the tertiary or service sector was just beginning its strong surge in growth, thereby opening up additional opportunities for women. In present circumstances, therefore, a reversal of the trend toward increasing participation of women seems unlikely in most OECD countries.

During the past two decades many countries have experienced some structural changes in the supply of labour which have had an important effect on the position of women in the labour market. The gradual decline in male participation rates, and the decline or postponement of youth participation in some countries may have contributed to an increase in opportunities for adult women. However, as the labour market is segregated to a large extent, so that many occupations are non-competitive between men and women, the impact of this change is not great.

The most dramatic change in women's position in employment has been associated with rapid increases in the participation rates of certain segments of the potential female labour supply. A high rate of labour force participation for single women is long established and is now only slightly lower than that of single men. It is the rate of participation of married women, although still lower than for single women, that has shown the greatest increase, and it

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(1) In most cases the projections of up to 1990 are based on time estimates made by the authorities of Member countries. In some cases, however, they represent OECD estimates where national data were not available.

continues its upward trend (Table 3). In the United States, for example, the participation rate for married women with husbands present was quite low in 1960 at about 30 per cent, but by 1974 it had risen to about 43 per cent; the rate for widowed, divorced, or separated women had been at about that level since 1960. Furthermore, an increased proportion of women of prime childbearing age are now remaining continuously in the labour force. Again taking the example of the United States, the rate for women in the 20-24 age group has increased dramatically, from 44.8 per cent in 1960 to 63 per cent in 1974 (Table 4). It is generally lower, however, for women with pre-school age children: the 1970 rate for women with one child under three years was 32 per cent

Another segment of the potential female labour supply which appears to have significantly increased its labour force participation is that of middle aged women with grown-up children. In many countries they have been returning to the labour market in greater numbers. Although comprehensive data are not available, one indication of the extent of this development can be seen in OECD demographic data. Participation rates of women aged 55-64 increased significantly between 1960 and 1975 in thirteen of the twenty-four countries surveyed; in four, the participation rate was virtually unchanged (1). In the United States, a survey has shown that for each of four age groups (50-54, 55-59, 60-64 and 65-69) the participation rate for women increased substantially between 1950 and 1977, while for men the pattern was reversed (2).

The participation rate of women is also affected by long-term trends in employment in the several sectors, particularly as agriculture has declined and the service sector increased in importance (3). The decline in agriculture, a traditional source of employment for women may have tended to lower overall participation rates in some countries particularly. However, in most, employment in the service sector has been expanding more rapidly than agricultural employment has been declining.

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(1) Demographic Trends: Their Labour Market and Social Implications (OECD mimeographed document).

(2) Employment and Training Report of the President, Washington, D.C., 1978.

(3) An OECD study (1977) entitled A Medium-Term Strategy for Employment and Manpower Policies showed that since 1965 the largest contribution to employment growth for OECD countries as a whole has been in the service sector, averaging 1.1 per cent per year in the period 1965-75. During the same period the industry sector contributed only 0.2 per cent per year to employment growth while agriculture showed a negative impact on growth of minus 0.5 per cent per year.

Table 3

LABOUR FORCE PARTICIPATION RATE OF MARRIED WOMEN

Year	United States	Germany	United Kingdom	Japan	Sweden*)
1960	30.48				
1961	32.74				
1962	32.72	33.5			
1963	33.72	33.3	34.38	50.12	47.0
1964	34.39	33.1	35.16	49.79	46.8
1965	34.72	33.7	36.14	49.77	47.2
1966	35.46	34.6	37.68	50.04	49.3
1967	36.80	33.3	37.71	50.26	49.8
1968	38.28	34.1	38.41	49.60	51.8
1969	39.59	34.5	39.36	48.71	53.4
1970	40.79	35.6	39.82	48.37	56.1
1971	40.78	36.2	39.18	46.98	58.2
1972	41.48	37.7	40.73	46.28	59.8
1973	42.23	38.90		47.05	61.2
1974		39.0			63.6
1975		39.1			66.2

*) Although Sweden is not one of the countries included in this study, when data were available, they have been indicated.

Source: Calculated using data from the Organisation for Economic Co-operation and Development, Department of Economics and Statistics, Labour Force Statistics. These data differ from the total participation rates. They are derived using the number of married women in the total labour force (including the armed forces) divided by the total population of women fifteen years and over.

SECTORAL AND OCCUPATIONAL SEGREGATION

The imbalance in representation of women in the major sectors of employment is indicated in Table 5. By 1976 women held more than two fifths of the jobs in the service sector, compared with about one quarter of the jobs in industry and only about a fifth of the jobs in agriculture.

This sectoral imbalance is far outweighed in importance by the imbalance in sub-sectors and occupations. Even within the major sectors women are concentrated in a far narrower range of jobs than are men. Furthermore, the jobs carry lower pay, involve fewer skills, and require less education and training.

Table 4

FEMALE LABOUR FORCE PARTICIPATION RATE BY AGE GROUP

Country	Year	15-19	20-24	25-59	60-64	65+
Australia	1966*	62.2	58.9	32.5	16.5	4.9
	1973**	56.0	62.3	44.5	16.3	3.4
Austria	1961*	75.4	75.2	49.9	19.8	7.1
	1971**	60.0	68.0	50.0	13.2	3.2
Belgium	1961*	40.6	52.2	27.9	9.4	3.7
	1970**	34.5	60.9	33.9	7.6	2.2
Finland	1960*	41.7	60.7	55.6	36.0	11.6
	1974**	32.7	65.9	75.1	33.3	2.0
France	1968*	31.3	62.3	45.3	32.4	8.2
	1974**	21.8	65.8	53.9	31.3	5.4
Denmark	1965*	60.8	61.9	44.0	28.0	7.8
	1973**	44.4	71.2	66.9	32.6	5.3
Sweden	1965*	40.8	56.2	41.0	27.0	5.1
	1974**	53.1	71.0	69.7	36.3	3.8
United States	1960*	27.6	44.8	41.0	29.4	10.1
	1974**	49.0	63.0	52.7	33.1	7.8

Sources: OECD (**) : Labour Force Statistics, Paris, 1976, pp. 20-21.

ILO (*) : Mimeographed document prepared by Madame Grounin, Geneva, 1975.

Table 5

FEMALE SHARE OF THE LABOUR FORCE AND SECTORAL EMPLOYMENT 1976

	Average for all OECD Countries	Highest Female Share	Lowest Female Share
Female Share of the Total Labour Force	34.6	45.6(Finland 1976)	26.0(Netherlands 1971)
Female Share of Agricultural Employment	27.9	52.5(Germany 1976)	9.0(Ireland 1971)
Female Share of Industrial Employment	21.2	29.2(Finland 1976)	7.5(Luxembourg 1970)
Female Share of Service Employment	42.3	60.3(Finland 1976)	10.1(Turkey 1975)

Source: Demographic Trends: Their Labour Market and Social Implications (OECD mimeographed document).

Despite the increasing proportion of women in civilian employment in most countries, there still exists a considerable degree of segregation, both industrial and occupational, according to sex. Table 6 shows the average distribution of women and men among the major industrial categories for eleven countries for the years 1965 and 1975 (1). Most of the women who work for wages or salaries (thereby excluding the self-employed) are concentrated in only three of the nine industrial categories. These are community, social and personal services (41 per cent of all gainfully employed women), wholesale and retail trade and hotels and restaurants (21 per cent), and manufacturing (25 per cent). Taken together these three industrial groups accounted for 87 per cent of all women, wage and salary earners in 1975, but only 70 per cent of men, who were more evenly represented in all industrial categories. The difference between male and female representation was particularly striking in the service industries, where only 19 per cent of the men had jobs, compared with 41 per cent of the women, and in manufacturing, where 38 per cent of the men were concentrated, compared with only 25 per cent of the women.

There were only four industries where less than 10 per cent of the men were employed compared to six such categories for women. The greatest disproportion between men and women is seen in the construction and transportation and communications industries: 12 per cent of the men worked in the construction industry compared to only 1 per cent of the women; the transport and communications industry accounted for 10 per cent of the men but only 4 per cent of the women.

There has been no significant change in industrial segregation over the past decade. In all the traditionally male industries there has been no change in the proportion of women since 1965 and indeed in manufacturing, the proportion of women has declined. If anything women are becoming even more concentrated, particularly in the traditionally female areas such as the services, retail trade and finance and insurance (where there is a substantial need for clerical occupations).

Segregation of occupations by sex is even more pronounced. Most women are concentrated in a small range of traditionally female occupations, in which they constitute almost the entire labour force. Typical female occupations are those of clerks, typists and stenographers, nurses and other health care workers, teachers and other child-care workers, social workers, cleaning and household service workers, sales clerks, and in the manufacturing field, garment and textile workers. A few examples are eloquent.

(1) The categories are defined by the International Standard Industrial Classification Code.

Table 6

AVERAGE DISTRIBUTION OF WOMEN AND MEN AMONG MAJOR INDUSTRIAL CATEGORIES FOR ELEVEN COUNTRIES, 1965 AND 1975 (1)

(Per cent)

Category All Categories	1965		1975	
	Female 100%	Male 100%	Female 100%	Male 100%
1. Agriculture, hunting, forestry and fishing (2)	3	5	2	3
2. Mining and quarrying	-	2	-	2
3. Manufacturing	31	39	25	38
4. Electricity, gas and water	-	2	-	2
5. Construction	1	14	1	12
6. Wholesale and retail trade, restaurants and hotels	19	11	21	13
7. Transport, storage and communication	4	11	4	10
8. Financing, insurance, real estate and business services	5	2	7	,5
9. Community, social and personal services	39	18	41	19

(1) The countries included are Australia, Belgium, Canada, Finland, Germany, Italy, Norway, Japan, Sweden, Switzerland and the United Kingdom. 1965 data were not available for Sweden; therefore that country was not included in the 1965 calculations. Similarly no 1975 data were available for Switzerland so that country was not included in the 1975 calculations.

(2) The table refers to wage and salary earners only. It does not include self-employed workers and therefore does not represent the entire civilian labour force. In those sectors where much of the labour force is self-employed, as for example in agriculture and to some extent in trade, the data do not reflect the real significance of these sectors as a source of employment for either women or men.

Source: OECD Labour Force Statistics 1964-1975.

In Japan (1975) women comprised 97 per cent of all nurses, 97 per cent of all stenographers and typists, 98 per cent of all household workers, 72 per cent of all garment and textile workers, 65 per cent of all accounting clerks and 64 per cent of all service workers. In Germany (1976) women comprised 99 per cent of the health workers, 97 per cent of the secretaries, 58 per cent of the clerks (an occupation which accounted for about two fifths of all

working women), 60 per cent of the wholesale and retail trade workers (accounting for about one eighth of all working women), and 75 per cent of the textile workers. On the other hand only 2 per cent of the carpenters were women, 6 per cent of the electricians and 5 per cent of the chemists, physicists and mathematicians. In the United States (1977) women made up 98 per cent of the stenotypists and 74 per cent of clerical workers (the two occupations together accounted for 35 per cent of all women's jobs); 74 per cent of the non-college teachers and 58 per cent of service workers (except private) - an occupation which accounted for about one fifth of all women workers. Women in the United States are markedly underrepresented in traditional male occupations such as carpenters (1 per cent), motor vehicle drivers (6 per cent), mechanics (2 per cent) and construction trades (5 per cent).

In Austria a special survey (1) undertaken in 1975 showed that more than half the women occupied low-level or medium-level positions, while the reverse was true for the men; more than half held skilled or semi-skilled jobs. Only 13 per cent of the females workers were in skilled occupations, compared with 45 per cent of the males. The disparity was similar for executive and professional occupations; 16 per cent of the females and 44 per cent of the males held such jobs. The Austrian survey found that "due to the low qualifications of most gainfully employed women they have greater occupational fluidity between segments of the economy", but they lacked the occupational mobility enjoyed by men. That is, women were able to move within their occupations from one employer to another and from one segment of the economy to another since "many typically female occupations such as typists or janitors are used in different businesses and different industries". Men on the other hand, with more specialised skills, were less able to move between industries but their skills enabled them to advance within their occupations more easily. The study concluded that there "is as yet no discernible trend to diminish the divided labour market because the movements of female employees who change employment and occupation are dominated by only a very few occupational categories covering services or simple production activities" (2).

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(1) Microsensus Survey, June 1975, on Changes in Employment and Work Satisfaction of Women, published by the Austrian Federal Ministry of Social Affairs, 1977.

(2) See also Christina Jonung, Occupational Segregation by Sex in Sweden, Problems and Policies, Nationallekonomiska Institutionen, Lunds Universitet, 1977, for further discussion of the problem. This study confirms the Austrian finding on the persistence of sex segregation in the labour market.

Reasons for the persistence of sex segregation are complex, rooted as they are in traditional attitudes on the appropriate roles of women and men in society. Public perceptions concerning these roles lead to sex stereotypes in work; the narrow range of jobs performed in consequence by women helps in turn to perpetuate the stereotypes. Also contributing to the continued division of the labour market is the difference in education and training for men and women, as well as for boys and girls. In most countries, until recently, girls and women have not been encouraged to undertake the kind of education and/or training which would permit them to enter a broader range of occupations. Indeed, training for certain occupations has not been available to women, or barriers have been maintained which have in practice excluded women. Examples are the barriers to apprenticeship training in the skilled crafts in the United States - barriers which are now gradually disappearing. The drive for improved training opportunities for women has largely come from the women themselves - acting either singly or as a group.

Since women also still bear the main burden of home responsibilities in most countries, they tend to choose education and occupations that allow them to combine home and family responsibilities with work, thereby further reinforcing employment segregation. Finally, the wage differential that exists between much of the work traditionally deemed to be for women serves to perpetuate the division. Men who might prefer a "female" occupation - such as clerk, stenographer, or sales clerk for example - are deterred from entering them because of the lower pay that is attached to them and the limited opportunities they afford for advancement.

DETERMINANTS OF THE CHANGING ROLE OF WOMEN IN THE LABOUR FORCE

Several reasons have been advanced to explain the sharply increasing labour force participation rates of women. Among them are the changing structure of the job market, improved educational opportunities for women, technological developments, which can lighten the burden of work in the home, the intervention of government to reduce employment discrimination, changing public attitudes toward the role of women, and the rising expectations of men and women both in terms of what they want in the way of material well-being, and what they hope for in the way of satisfaction and fulfilment from their work. The importance of each of these factors varies between countries.

Long-run sectoral shifts in demand may have also contributed to the continued rise in both female labour force participation and

the continuation of segregation by sex in the labour market. Women occupy a very high proportion of jobs in the service sector in most countries. A long-term structural trend towards higher consumption of services is thus likely to pull women into this expanding sector. This demand pull has been an important factor in many OECD countries. The sectoral distributions of demand for labour and the structure of wages, in a period when many countries are beginning to emphasize equal pay for equal work policies, will be influential in determining whether demand pull will continue to attract women into paid employment.

On the supply side, the Working Party takes the view that the range of motives for which women undertake paid employment is similar to that applying to men. The consistently higher participation rates of women in low income families and of women heads of household (whose number has risen considerably in some countries) suggest that economic pressures affect women and men similarly. The increasing participation rates of married women with husbands present also suggests that, for most families, a single income is no longer regarded as sufficient and that the threshold at which total family income reduces the motivation of both spouses to undertake paid employment is high. It also suggests that the economic trade-off point between working at home and working outside the home has shifted in favour of outside work. The significance of two incomes per family was brought out in the 1974-75 recession, as women, in an effort to maintain family income, either entered or increased their efforts to remain in the labour market. The fact that women are concentrated in the service sector which was in most countries less affected by the recession than the industrial sector - the traditional employment sector for men - also contributed to this development. This does not imply that women workers were unaffected by the recession: in fact, unemployment rates for women, higher than for men even in normal times, were higher still during the recession.

Studies have shown that women, especially those with a higher level of education and training, are increasingly attracted to work because in addition to the economic incentive, like men in the same situation, they seek individual fulfilment in putting their education and training to use by pursuing careers outside the home. Data concerning labour force participation by level of education and sex (see Chapter II, Women in Education and Training, Table 8) for a number of countries certainly confirm the fact that, for women, the highest participation rates are found among those with the highest educational attainment. In the Unites States, furthermore,

attitudinal surveys suggest that the proportion of young women aged 14 to 24 who expect to work at the age of 35 is increasing (1).

In short it is now apparent that, after a post war drop, an increasing proportion of women are again making a commitment to work comparable with that of men. A number of social and economic changes are associated with this commitment, including, for example, the trend towards smaller families, different ways of sharing home and parental responsibilities between men and women, and an increase in the proportion of two wage-earner families. Governmental manpower and social policies, particularly in the areas of child-care and early childhood education, access to education and training, and equal employment opportunity, help to reinforce the change in labour market behaviour of women. Some data assessing the importance of each of these factors will be analysed in the following chapters.

An unpublished American survey by Emily S. Andrews, on the determinants of the changing role of women, focuses on seven OECD countries. The countries, Belgium, France, Germany, Italy, Japan, the United Kingdom and the United States, not only provided a spectrum of economic situations, but also represented significant differences in labour force participation.

The study concentrates on those factors which economic theory suggests might influence rates of labour force participation, and summarises some of the current arguments on the determinants of participation. One theory tested concerns the influence of marital status and the presence of children. The argument can be based on theories of social custom or on economic theories of relative productivity differences between men and women in the labour market and at home. Another thesis examined is that differences in relative male-female earnings could have a significant impact on the labour force participation of women. For example, if potential earnings for women were too low, women would not be tempted to enter the labour market since the cost of leaving home would be higher than the benefit. On the other hand higher earnings would permit the substitution of services for home production, thereby increasing female participation. Theory also indicates that changes in occupational demand interact with the female labour supply, particularly in regard to changes in those occupations which are regarded as traditionally female. Still another thesis concerns the impact on female labour force participation of job stereotyping. whether the result of explicit sex discrimination or of unconscious choice conditioned by long-established cultural and social bias.

(1) "Years of Decision", Volume 3 The Ohio State Center for Human Resource Research, Columbus, December 1973, p.15, quoted in Manpower Report of the President, 1975.

The possible effects of sex discrimination cannot be ignored. Discrimination can affect participation in two ways. If women's wages are kept low because of discrimination, the supply of labour is reduced. On the other hand, demand for women's services in a narrower range of occupations leads to increased participation in these occupations, but also to crowding, and consequently to the maintenance of low wages. In most OECD countries, unequal pay for work of equal value is no longer the principal factor holding down women's wages. The problem seems to stem rather from the unequal opportunities for employment in this limited range of occupations, and consequently from inferior opportunities for on-the-job training and (in some countries) for general and vocational education.

While the reasons why women take gainful employment are as varied as those for men, the main factors that influence the female participation rate might be summarised as follows:

- Economic factors. The main reasons why women enter the labour market are economic: to earn a living, to increase family earnings and as an investment for the future. This is especially the case for single women and for female heads of household, but it is also a factor for married women whose spouses are also earning. The current incidence of inflation has increased the need for women to take gainful employment in order to maintain real family income, but rising expectations and the desire to improve standards of living also play a part.
- Marital status is an important determinant of female labour force participation in most countries, but even more important is the presence of children, and their number, age and spacing. Women with very young children tend to stay out of the labour force, although this factor is diminishing in importance.
- The availability, quality and price of substitutes for home production, especially child care. While advances in the manufacture and distribution of food and clothing have long been absorbed, and mechanical home-care substitutes are not particularly significant as a factor, the availability of good quality, reasonably priced child-care services is of importance to all parents.
- The contraction or expansion of those sectors of the economy that tend to favour the employment of women. Currently this involves the service sector where women represent a larger share of the work force than they do in other sectors. Since the service sector has shown the strongest employment growth in most countries - a trend which is projected to continue -

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job opportunities for women albeit in a limited range of occupations, should also expand.

- Working conditions, particularly the availability of part-time or flexitime work for both men and women. Provision of such conditions should not be considered only in the context of child care. Nevertheless, in countries where women are generally expected to assume major responsibility for the care of children and the home, they are often forced to take a part-time job so as to carry this double burden. In countries where a pattern of sharing home and child-care responsibilities between both parents is developing, the availability of suitable part-time or flexitime employment for both sexes becomes increasingly important, as does the possibility of generally shorter working hours.
- Finally, women wish to exercise their right to employment and promotion, guarantee their social status and obtain recognition of their rights as independent persons. In modern societies, this involves paid employment, since so many benefits derive from it and it confers a degree of economic independence. Aside from income, economic benefits include unemployment and health insurance, paid holidays, and retirement and invalidity pensions. But non-economic benefits, such as social status and satisfaction with the intrinsic nature of the work, are also important.

IMPLICATIONS FOR SOCIO-ECONOMIC POLICIES

Despite recent advances, women are still subject to potential discrimination in employment and do not on the whole, enjoy earnings and occupational status comparable with those of men. Reasons for inequality are varied but stem from traditional societal attitudes toward women which in turn are based on the role of women as bearers of children with major responsibility for child rearing and home care. On this assumption moreover, many women follow educational pursuits and training courses appropriate for such a role, and often choose occupations that can be left during their children's earliest years and re-entered later on. Consequently, many married women with children do not enjoy continuity of employment experience leading to occupational advancement, seniority benefits and increased earnings.

On the other hand, although women's rates of participation in the labour force vary by age, education, size of family and other factors, they have generally increased over the past several decades,

in some countries dramatically. This development has already directly affected employment policies, which are likely to continue evolving. A number of governments have initiated some form of equal employment policy, and recognition of the principle of equal pay for work of equal value has brought about some narrowing of male-female wage differentials.

The altered position of women in the labour force also has implications for public policy in many related areas, some of which are discussed in the following chapters. In turn, changes in these policy areas are likely to encourage a continued high participation rate or even to increase it. Improved access to the educational system and equality in education would improve women's chances in the labour market and increase equality in employment. The provision of a sufficient number of child-care facilities for both pre-school and school age children at low cost would increase the benefits of employment for working parents. Expanded possibilities for flexible working schedules and life-long allocation of time could make it easier for both men and women to combine gainful employment with responsibilities for home and family. Adjustments in retirement provisions may also tend to keep women in the labour force as long as men. Empirical evidence is not readily available to show the precise relationship between such changes and the labour force participation rate of women. Nevertheless, given the direction of the current pressure for change in these policy areas, the most likely result is that women will continue to increase their participation in the labour force in most countries.

Policies affecting the employment of women should be designed to conform with and support the changing conceptions of the social and economic roles of men and women. In the remainder of this report, the need for some differential policies for women is recognised as the basis for public policy options, since governments increasingly wish to ensure effective equality of the sexes in employment. For women particularly, but also for men, this means improving opportunities for education and training, for entering the labour force, for advancing, as appropriate, in their chosen occupations and careers, and for creating a better equilibrium in the distribution of roles and tasks (occupational and family obligations) between the sexes.

Table 7

WAGE EARNERS AND SALARIED EMPLOYEES BY ACTIVITIES-SALARIES (OUVRIERS ET EMPLOYES) PAR ACTIVITES

(FEMALE / MALE) (FEMMES / HOMMES)

	Australia Australie		Belgium Belgique		Canada Canada		Finland Finlande		Germany Allemagne		Italy Italie		Norway Norvège		Japan Japon		Sweden Suède 4)		Switzerland Suisse		United Kingdom Royaume-Uni	
	F	M/H	F	M/H	F	M/H	F	M/H	F	M/H	F	M/H	F	M/H	F	M/H	F	M/H	F	M/H 2)	F	M/H
Agriculture, hunting forestry and fishing																						
Agriculture, chasse, sylviculture et pêche																						
1965	-	0.5	0.1	0.8	0.8	4.2	2.7	11.1	1.5	1.8	13.4	12.3	0.8	4.1	2.4	3.1	-	-	10.3	8.6	1.6	3.2
1970	0.1	0.4	0.1	0.6	0.7	3.4	1.9	7.9	1.0	1.5	10.4	9.2	0.5	2.9	1.1	1.6	0.9	4.9	5.0	4.6	1.3	2.5
1975	0.1	0.5	0.1	0.5	0.9	2.9	1.2	5.1	1.0	1.3	9.7	7.8	1.1	3.5	0.8	1.5	0.9	3.7	-	-	1.1	2.2
Mining and quarrying																						
Industries extractives																						
1965	0.2	1.8	0.1	4.8	0.2	3.2			0.4	3.0	0.3	2.9	-	0.9	0.3	1.3	-	-	-	0.4	0.2	4.0
1970	0.3	2.3	0.1	2.5	0.3	2.6			0.3	2.2	0.4	2.9	-	0.9	0.2	0.7	0.1	0.9	-	0.4	0.2	2.8
1975	0.3	2.4	0.1	1.7	0.3	2.3			0.3	2.5	0.4	3.1	-	-	0.1	0.6	0.1	0.9	-	-	0.2	2.5
Manufacturing																						
Industries manufacturières																						
1965	28.0	37.3	34.7	42.9	19.0	31.6	26.0	36.5	40.6	46.2	39.6	34.6	21.2	37.1	36.5	33.6	-	-	33.6	45.7	32.3	39.7
1970	24.4	35.3	31.3	41.2	16.5	30.4	20.1	39.3	39.6	47.5	42.0	37.1	19.1	37.7	35.6	34.1	18.8	37.7	32.5	43 8	29.8	41.5
1975	18.3	29.7	26.5	38.1	15.2	27.8	24.8	38.8	32.6	44.3	38.2	38.2	16.6	37.3	30.9	31.3	18.3	39.0	-	-	24.3	38.9
Electricity, gas and water																						
Electricité, gaz et eau																						
1965	0.7	3.7	0.2	1.4	0.4	1.7			0.2	1.7		-	0.3	1.7	0.3	1.2	-	-	-	1.4	0.6	2.5
1970	0.5	3.6	0.2	1.5	0.6	1.7			0.2	1.2	-	-	0.2	1.8	0.3	1.1	0.4	0.9	0.1	1.7	0.7	2.4
1975	0.5	3.0	0.2	1.5	0.5	1.7			0.4	1.3	-		-	-	0.3	1.1	0.2	1.3		-	0.7	2.1
Construction																						
Bâtiments et travaux publics																						
1965	0.7	11.7	0.5	12.3	0.7	9.4	1.4	19.5	1.2	13.7	0.5	19.4	0.8	15.2	4.4	11.6	-	-	0.7	14.5	1.0	10.4
1970	1.1	12.2	0.5	12.3	0.8	8.3	1.9	17.7	1.3	12.5	0.6	18.0	0.7	13.5	4.1	11.8	1.2	15.6	1.3	14.5	1.0	8.9
1975	1.1	12.5	0.7	11.8	1.0	9.0	1.8	16.6	1.7	11.9	0.5	15.7	1.3	13.0	4.2	13.2	1.0	11.5	-	-	1.1	9.0

Wholesale and retail trade and restaurants and hotels																						
Commerce de gros et de détail, restaurants et hôtels																						
1965	22.2	15.4	14.5	9.1	17.6	15.5	-	-	21.7	7.8	9.3	6.9	26.6	11.5	-	-	-	-			24.2	11.0
1970	21.7	14.5	15.4	11.2	17.0	16.7	24.4 [1]	-	21.7	8.1	9.2	6.8	25.2	12.8	23.4	16.1	20.2	10.3			22.4	10.5
1975	32.0	20.5	16.1	12.1	18.3	16.5	23.5	11.1	20.6	8.5	9.7	6.9	24.3	11.3	24.9	17.0	17.3	12.0	-		22.5	11.2
Transport, storage and communication																						
Transports, entrepôts et communications																			[5]	[5]		
1965	3.8	10.8	1.9	10.9	4.3	10.8	5.2	9.7	3.4	8.9	2.2	8.4	6.5	17.2	3.1	11.9	-	-	55.3	29.0	3.3	9.5
1970	3.7	10.7	2.0	9.9	3.9	10.7	4.6	10.6	3.2	8.1	1.8	8.2	6.4	14.4	3.6	12.3	4.2	8.9	60.	35.6	3.0	9.4
1975	3.9	9.7	2.6	10.8	4.0	10.4	4.4	10.5	3.6	8.4	2.0	8.4	5.6	12.5	3.3	11.1	4.3	8.6		-	2.9	9.2
Financing, insurance, real estate, and business services																						
Banques, assurances, aff. immobilières et services fournis aux entreprises																						
1965	6.1	3.8	2.9	2.6	7.0	3.4	64.0		5.5	2.8			4.0	2.0	n.a.	n.a.					5.8	3.3
1970	6.2	4.1	6.2	4.9	7.6	3.7	65.6		6.1	3.3			4.2	2.4	5.2	2.9	6.3	4.6			6.9	3.9
1975	10.6	6.5	7.1	5.5	8.3	3.5	44.4		7.5	4.1			5.8	4.1	6.1	3.5	6.2	5.0			7.4	4.6
Community, social and personal services																						
Services fournis à la collectivité, services sociaux et services personnels															[3]							
1965	38.5	14.9	45.1	15.1	50.0	20.1		22.7	25.5	14.0	34.7	15.5	40.1	12.3	53.3	37.3					31.3	16.4
1970	42.0	16.9	44.2	15.9	52.8	23.4		24.6	26.6	15.5	35.6	17.9	43.6	13.8	26.5	19.4	47.8	16.1			34.7	18.0
1975	33.3	15.2	46.6	17.9	51.4	25.8		17.9	32.3	17.5	39.5	20.0	47.2	18.0	29.5	20.6	51.7	17.8			39.8	20.3
Activities not adequately defined																						
Activités mal désignées																						
1965								0.6					-									
1970													-			0.1						
1975													0.2	0.2		0.1						

1) 1971
2) 1960
3) Includes finance, insurance, real estate
4) Data not available for 1965
5) Includes all other categories

Sources : OECD, Labour Statistics, 1964-1975

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II

WOMEN IN EDUCATION AND TRAINING

ROLE PREJUDICE IN SOCIETY AND EDUCATION

> "Whether the success of women is measured by entrance into professional schools in industrialised countries or high school enrolment in developing societies, women are taking advantage of education to improve their social and economic positions in unprecedented numbers. Recent gains in women's literacy, formal schooling and participation in the teaching profession suggest that, while many formidable inequities remain to be overcome, the steady advances in women's education augur well for the emergence of a social order in which the ideas and energies of women are fully expressed." (1)

These remaining inequities have their roots outside the education system itself, for the experience of young people outside school has an influence on their aspirations, motivation and achievement. Whether a student continues in education and which field he or she selects depends to some extent on the role models presented to the student in the home environment. As was illustrated in Chapter I, the increased economic activity of women has been mainly limited to a few traditional areas, while at the same time they retain the major share of family responsibilities. Inevitably, this has an effect on the activities of young women in the school system, which continues to reflect and reinforce the sex roles generally prevalent in society. The position of those women who are wage earners and mothers of young children often presents their children with a confusion between the occupational and maternal roles. The influence of the family in the life of the child will contine to supplement education in school and it may require special attention to preserve the benefits of family influence, while encouraging practices which will result in more women entering the labour force or remaining in school after bearing children.

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(1) The Unfinished Assignment - Equal Education for Women, Worldwatch Paper 7 (July 1976), preface paragraph 2.

The problems related to role prejudice and employment inequality between the sexes are intertwined with the problems related to the education of women, and the ways in which this education varies from that of men. The images of possible and actual roles for men and women are learned early in childhood and are constantly reinforced during the long process of socialisation of which the educational system forms an important part. As Professor Kenneth E. Boulding has expressed it:

> "The very social visibility of the distinction between the sexes makes it a prime candidate for role prejudice, which creates a huge reservoir of false knowledge, false education and false learning process. All are costly to society in exactly the same sense that an unknown and unutilised natural resource is costly in the sense of opportunity foregone. We can, oddly enough, think of role prejudice as a large natural resource which can be mined by the development of true knowledge and better learning processes to the benefit of the whole society." (1)

The existence of such role prejudice in every country has, therefore, limited men as well as women to certain roles and life patterns. It follows that the goal of equality between the sexes in status and treatment implies changes in men's conditions as well as in women's. As for women, these changes include greater opportunities for all fields of education, training and paid employment. In the case of men, it implies, among other things, the possibility of assuming greater responsibility for home and children, as well as education and training in such matters as homemaking and child rearing.

While such changes in the direction of greater interchangeability of male and female roles are increasing, it is still a rather marginal phenomenon in most countries. Resistance to such changes has so far been solid in our society and a social stratification based on sex seems to contain a rather weak internal dynamic for change. Therefore, the problem of designing effective measures to achieve equality for women both in the traditional sense (i.e. equal status with men in society) and the more far-reaching sense (i.e. equal status with men but a greater interchange of male and female roles) is much more difficult than achieving merely theoretical commitments. However, even if progress is slow and the

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(1) "Combatting Role Prejudice and Sex Discrimination: Findings of the American Economic Association Committee on the Status of Women in the Economy." The American Economic Review, December, 1973.

ultimate results are difficult to foresee, everything points towards continuing, growing and more equal participation of women in the economy and the labour market. Consequently, the importance of the inter-relationship between employment and educational policies is immense.

The rising trend in women's participation in employment is likely to change their perception of the function of education. As women become a larger proportion of the labour force in industrialised countries and increasingly remain in the labour market after they marry and have children, the demand by women for an education which is relevant to life-long employment will increase.

The nature of women's labour market experience will also affect educational choice by young women. If employment for women remains highly segregated, this will affect both the amount and type of education selected by girls. If they perceive little opportunity for entering occupations other than those traditionally considered appropriate for women, then they will continue to select a pattern of education and training which has relevance to a working career as secretaries, sales clerks, nurses, teachers, etc. If, on the other hand, public policy in the labour market is aimed at, and results in, changing occupational segregation by sex, many women will adjust their aspirations and be motivated to change their pattern of education. Thus, the reduction of occupational segregation will affect role prejudice within the educational system itself. The role models for young girls will become more extensive and influence the future aspirations of students.

The persistence of existing sex differentials in earnings and wage rates will also affect the amount of education consumed by women. The economic return from the amount and type of education and training will influence whether young women are motivated to embark on an extended educational career. However, it would be a mistake to over-emphasise the importance of the economic return in the labour market in influencing women's behaviour in the educational system. Apart from the fact that education is consumed partly because it has value in non-economic terms, the relevant decision for young women involves a comparison of the potential labour market return to <u>women</u> from different educational investment decisions. Whereas the narrowing of wage and earnings differentials between men and women in the labour market will ultimately encourage young women to consume more education, the participation of young women in education may also increase only because more education is likely to lead to greater choice among occupations, even if the range is more limited for women and despite the wage and earnings differential.

The expansion of educational opportunities which has occurred in most OECD countries since World War II has had important labour market implications. The proportion of young people remaining in education through secondary school and post-secondary education has increased. Many more are now participating in education and employment simultaneously. This has raised important policy issues concerning the transition to employment and has affected labour market problems and policies.

Educational institutions have been slow to change. However, the gradual increase in educational opportunities for young people has had important results for young girls. This has had some effect on the nature of programmes within educational systems. Teachers are now more aware of the problem of role prejudice in education and in some countries gradual change has occurred. Schools and classes segregated by sex have become fewer; the influence of the women's movement has in some countries led to an awareness of the need to develop curricula and teaching materials which are less likely to encourage young girls to restrict their educational choices to courses which lead mainly to the stereotyped "women's" jobs. While these internal changes within education have been modest, in many countries they are beginning to influence the labour market by increasing the supply of young women qualified to do jobs previously performed almost exclusively by men. This has created considerable pressure within the labour market to change existing hiring practices, to which governments in many countries have responded by mandating some form of equal employment opportunity policy. The level of educational attainment of women is therefore a most important element in determining their future employment pattern.

Labour force participation is directly related to the educational attainment of women. Generally, the more education a woman has had, the greater her degree of participation. This is seen clearly in figures on participation rates by level of schooling, presented for several countries in Table 8. While the participation rate of women increases with each higher level of schooling attained, there is no such clear connection between educational level and economic activity of men. The fact that better educated women tend to have a higher labour force participation rate than those with less education may reflect their ability to locate and retain desirable jobs which are monetarily and psychologically rewarding as well as being relatively stable.

Many other factors affect the participation rate of women in employment. Consequently, the results in Table 8 have to be treated with considerable caution. As discussed in Chapter I, household

Table 8

LABOUR FORCE PARTICIPATION BY
LEVEL OF EDUCATION AND SEX (IN PER CENT)

	Women	Men
Australia (1971) (1)		
Primary school (employed persons) (2)	22.6	71.6
Secondary school (employed persons (2)		
- attended (7-10 years)	41.8	89.2
- completed (12 years)	49.3	82.1
University and other post-secondary	57.8	90.7
Austria (1971) Ages 25 to 34 years (3)		
Primary school	48.3	97.3
Intermediate school	62.9	99.2
Secondary school	60.8	76.4
University and other post secondary	74.9	94.5
France (1968)		
No degree	28.6	
Primary school	40.4	
Vocational secondary school	62.9	
Academic secondary	61.7	
Higher degree	69.3	
Sweden (1976) (3)		
Primary and lower secondary (10 years)	58.6	73.0
Upper secondary (between 1 and 2 years)	74.2	89.9
Upper secondary (over 2 years)	72.1	86.6
Up to 2 years post-secondary	81.1	81.3
Over 2 years post-secondary	86.7	92.5
United States (1972) Ages 25 to 34 years		
Primary school (8 years)	39.1	92.6
Secondary school		
- attended (9-11 years)	40.8	95.5
- completed (12 years)	47.3	97.7
University		
- attended (1-3 years)	49.9	94.1
- completed (4 years)	57.8	97.3

Source: The Role of Women in the Economy, OECD, Paris, 1975, Table 7, p.27, and United States Department of Labor, BLS, Special Labor Report No. 103, 1972.

(1) 1971 Census of Population and Housing.

(2) Participation by primary and secondary education are only available for 1971 for employed population rather than for the labour force which includes employed and unemployed persons.

(3) Communications from labour ministries.

income, marital status, number of children, etc., affect participation rates. Nevertheless, there is increasing evidence to suggest that the higher level of educational attainment of young women has contributed to the larger share of employment which they now have in most countries.

There is also evidence from a number of countries that the more highly educated a woman is, the more likely she is to return to work after child-rearing. The upward trend in participation rates in the labour market is notable in particular for two groups of women: those in the prime child-bearing years who are increasingly remaining in the labour force with fewer and shorter interruptions for childbirth; and those in middle age with grown children who have been returning to the job market in ever greater proportions. In other words, the traditional assumption about the discontinuity of women's lives is becoming untenable. Until recently, the number of mothers with preschool children in the United States, for example, represented a very small proportion of the labour force. Today these statistics have altered and the assumptions drawn from them need to be reconsidered. One-third of married women in the United States aged 25-34 with children under six and with four years of higher education are in the labour force; with five or more years of higher education, the figure goes up to almost forty per cent. The impact of education appears to be influential in raising the participation rate of women heads of households. Almost three quarters of women heads of household with children under six are in the labour force.

PATTERNS OF PARTICIPATION AND COURSE CHOICES

It has been argued above that the fact of being male or female has a special influence on educational and vocational decisions. The differences between men and women in years of schooling and in the nature of that schooling are two manifestations of fundamental importance to the future employment opportunities of both. As the total number of students in secondary and post-secondary education has increased over the last 25 years, female students have in many countries increased their number of years of full-time education. Table 9 shows that by 1970, for some of the most highly industrialised countries, women had only slightly lower average years of education than men. Because of compulsory school requirements, the average number of years for boys and girls under 15 years of age was almost identical. For the age group 15-18 years, the amount of schooling was similar for young men and women in Canada, Sweden and

Table 9

NUMBER OF YEARS OF FULL-TIME SCHOOLING
IN SELECTED COUNTRIES, FOR SELECTED YEARS

Country	Year	Total Education Received		Compulsory Education Received age 15		Education Received 15-18 and over		Education Received age 19 and over	
		M	F	M	F	M	F	M	F
Austria (1)	1971	9.5	8.8	7.7	7.6	1.4	1.0	0.39	0.21
Canada	1971	9.6	9.6	7.3	7.4	1.8	1.9	0.47	0.27
Germany (2)	1970	9.3	8.7	7.7	7.7	1.2	0.9	0.33	0.12
Japan	1970	10.3	9.6	7.8	7.7	2.0	1.8	0.45	0.14
Sweden (3)	1970	9.2	8.8	6.8	6.8	1.9	1.8	0.51	0.30
United States	1970	10.7	10.6	7.5	7.6	2.4	2.5	0.72	0.51

Source: Education Statistical Yearbook 1974, Vol 1, Section VI, and later census-survey information.

(1) Aged 15 and over.

(2) Total population no longer attending school.

(3) Aged 15-59.

the United States. For this age group a male-female differential in amount of education appeared for Austria, Japan and Germany. In the 19 years and over category, this differential was evident. By 1970, therefore, women had in many countries come close to matching men in the amount of education they received, at least up to the middle age groups in secondary education.

In many OECD countries, the issue of equal opportunity for women was still in its infancy in the 1960s. The issue of women's rights and equal opportunity became more firmly established in the 1970s and any institutional impact of changes in the role of women in society would not be likely to emerge with any force before the mid-seventies. Table 10 presents the male-female participation rates in secondary education for some eighteen Member countries over the period 1970-75. The participation rates are for students of seventeen years, since it is at about this age that differences in participation by sex are likely to emerge.

In most countries, the participation rates of male and female 17-year-olds were quite similar. In fact, in Ireland and France the female rate was actually higher than the male rate. In several countries (Denmark, Germany, Greece, the Netherlands, New Zealand, Portugal and Spain) young men had a substantially higher participa-

Table 10

SECONDARY EDUCATION

Rate of participation of all full-time students aged 17 in 1970 by sex compared with subsequent year indicated

Country	1970		1975 or year available		Change	
	M	F	M	F	M	F
Australia	32.1	23.8	31.4	29.5	- 0.7	+ 5.7
Austria	(1969) 24.9	22.4	(1970) 26.4	25.8	+ 1.5	+ 3.4
Belgium	57.0	51.8	65.8[1]	63.6[1]	+ 8.8[1]	+11.8[1]
Canada	77.0	75.0	(1974) 73.6	72.6	- 3.4	- 2.4
Denmark	53.0	38.0	(1974) 51.0	42.0	- 2.0	+ 4.0
France	42.1	49.0	56.3	59.6	+14.2	+10.6
Germany	23.7	19.1	(1971) 25.6	20.7	+ 1.9	+ 1.6
Greece	53.6	39.8	NA	NA	-	-
Ireland	35.7	43.3 37.5	(1974) 45.3		+ 7.8	
Japan	74.6	75.0	NA	NA	-	-
Netherlands	55.7	35.2	71.0	51.1	+15.3	+15.9
New Zealand	31.3	25.3	31.8	28.6	+ 0.5	+ 3.3
Norway	58.7[2]	58.1[2]	62.1	61.5	+ 3.4[2]	+ 3.4[2]
Portugal	21.0	16.5	31.4	29.2	+10.4	+12.7
Spain	27.3	17.2	38.4	30.7	+11.1	+13.5
Sweden	57.3	51.5	63.1	61.3	+ 5.8	+ 9.8
United Kingdom	26.5	25.9	27.5	29.0	+ 1.0	+ 3.1
United States	88.2	84.2	86.1	81.2	- 2.1	- 3.0

Source: Unpublished OECD Department of Educational Statistics, based on responses to questionnaires sent to Member countries.

NA = Not Available

1) Projections.

2) Estimates.

tion rate than young women. Over the past five years, however, this gap in participation narrowed in Denmark, New Zealand, Portugal and Spain. Lack of data for 1975 prevents any comment concerning the situation in Germany. In the Netherlands, while participation has increased for both sexes, the gap between males and females has

widened. This comparison of the changes which have occurred since the beginning of the decade also shows that in countries which already had very high participation rates for 17-year-olds (Canada and the United States) there has actually been a slight decline in both the male and female rate over the past five years.

In short, recent trends in participation rates of youths in most countries show that the level has been rising for both young men and young women. For some countries there is still a gap between the male and female rates but it has been narrowing. In a few countries, however, equal participation is no closer than it was in 1970.

At the higher education level it has long been evident that in most countries young women do not participate to the same extent as young men. The information presented in Table 11 is designed to illustrate this phenomenon and try to assess whether the differential by sex is beginning to change. A comparison of participation for the 21-year-old age group is taken as a proxy for enrolment in higher education. For a fairly large group of countries (Austria, Australia, Belgium, Canada, Denmark, Germany and the United States), the participation of women in higher education was about half the rate for men at the beginning of the decade. In Japan, the Netherlands, New Zealand and Spain, women's participation rate in higher education was about one-third the rate of men, while in France and Portugal the male-female differential was much smaller. For these latter two countries, however, participation in higher education was among the lowest of all the countries for which data are currently available. In Norway the male and female rates were similar in 1970.

The issue of whether, in the 1970s, there are signs that the traditional pattern of women's participation in higher education is changing is an important one, since it has implications for other areas of social policy. As Table 11 shows, the participation rates in 1975 are not available for all countries. Nevertheless, preliminary inferences can be drawn for a number of OECD countries. In most countries, participation rates have either increased slightly or are projected to do so for both males and females during the first half of this decade. There are several exceptions to this trend. In Canada, Denmark and the United States, the participation rates for males, which are very high, have declined or, in the case of Canada, are expected to decline.

Another important trend that emerges from these data concerns the gap between male and female participation rates. In several countries there has been or is expected to be a narrowing of the differential. This trend is quite strong for Denmark and the United

Table 11

HIGHER EDUCATION

Rate of Participation of Full-Time Students Aged 21 in 1970, by Sex

(Comparison is with subsequent year indicated)

Country	1970		1975 or year indicated		Change	
	M	F	M	F	M	F
Australia	6.3	2.6	8.6	5.1	+ 2.3	+ 2.5
Austria	7.8[1]	3.2[1]	9.3[1]	6.1[1]	+ 1.5	+ 2.9
Belgium	17.5	8.0	20.4[2]	11.5[2]	+ 2.9[2]	+ 3.5[2]
Canada	27.5	14.7	(1974)23.7	14.7	- 3.8	.0
Denmark	29.0	13.0	(1974)26.0	15.0	- 3.0	+ 2.0
France	13.0	10.3	14.4	11.9	+ 1.4	+ 1.6
Germany	12.0	9.3	13.0	10.3	+ 1.0	+ 1.0
Japan	22.1	5.0	NA	NA	-	-
Netherlands	19.1	6.1	12.6	4.6	- 6.5	- 1.5
New Zealand	13.4	5.3	13.1	8.0	- 0.3	+ 2.7
Norway	20.2[3]	18.4[3]	23.7	21.6	+ 3.5[3]	+ 3.2[3]
Portugal	7.9	7.4	14.0	11.7	+ 6.1	+ 4.3
Spain	14.5	6.7	17.4	14.1	+ 2.9	+ 7.4
United States	38.7	20.7	33.6	25.2	- 5.1	+ 4.5

Source: Unpublished OECD Department of Educational Statistics, based on responses to questionnaires sent to Member countries.

NA = Not Available

1) Austrian students of scientific and technical universities only (without foreigners).

2) Projections.

3) Estimates.

States, and moderate for Spain, Canada, Belgium and New Zealand. Available evidence suggests that the differential in male and female participation rates at the higher education level will, however, increase slightly for Germany, the Netherlands and Portugal. Of course, there may be many institutional reasons why women in some countries have a relatively low participation rate in higher education: one of the striking findings is that in several countries less than ten per cent of women aged 21 are participating in higher education.

There are no readily available data comparable among countries that show the differences in course choices between young men and women. Nevertheless, there is evidence from individual countries that they are substantial. Previous OECD country reports (1) indicate that the problem of the type of courses available to young girls is well documented in its general aspects.

In most countries it is at the secondary level that important decisions are made affecting future educational and career patterns. In most European systems, students divide at the secondary level into vocational and theoretical (academic) course streams. In a few countries, education at the secondary level takes place in comprehensive or amalgamated secondary schools which mix students who plan to attend university with those learning a trade. The more prevalent arrangement separates students into different classes and frequently into separate school systems. The difference in course choices is especially pronounced when secondary school is not completed. Young women frequently end up in technical programmes which provide them with courses on the basis of existing stereotypes - such as sewing - rather than in technical programmes which emphasise skills for expanding occupations.

A characteristic of the vocational school system is that boys and girls pursue very different courses of study and that their course choices follow the traditional sex-typing of occupations. Girls are concentrated in business and commercial courses, health care and home economics. Boys, on the other hand, form the vast majority of those taking technical, industrial and trade subjects. A similar difference is found in the specialisation followed by students in the academic stream. Here, there is a pronounced tendency for girls to be enrolled in the humanities, while boys are heavily represented in mathematics and science.

The pattern of course choices established at a younger age continues in the subjects taken by women and men at various institutions of higher education. In the universities of every country, women are strongly represented in languages, letters and the arts - the more general cultural fields. They are poorly represented in disciplines with a strong vocational emphasis, with the exception of education and health care. Science and mathematics remain the almost exclusive preserve of men.

Similarly differentiated course choices are found in course enrolments at other post-secondary schools, which include university technical institutes, two-year colleges and community colleges. Women once again tend to to predominate in fields considered preparatory for traditional "women's jobs", such as nursing and primary

(1) The Role of Women in the Economy, OECD, Paris , 1975.

school teaching social welfare, commerce and nutrition. They are very rarely found in such technical and mechanical fields as aeronautics, electricity and electronics, and chemicals.

Deficiencies of initial education do not lead to the same dead end today as they used to do for women and men either in seeking their first jobs or in obtaining promotion. Because of accelerating technological change, learning is increasingly regarded as a continuing process for all individuals. Vocational training and basic education programmes, previously oriented primarily towards new school leavers, are being redefined to mesh with lifelong learning strategies. Consequently, in many countries, parents who have worked in the home and who now seek further education or gainful employment, workers who aspire to better-paying jobs, and those whose jobs have been altered or eliminated by technological advances, are taking advantage of a second chance for education.

Present educational programmes for adults are essentially of three types: (i) the general-interest continuing education courses, which include academic courses in language, the arts and literature, and courses in photography, art, carpentry, sewing and other "hobby" areas; (ii) basic education courses in language and mathematics for those whose initial education was incomplete; and (iii) vocational training courses which are frequently organised by labour ministries, trade unions and/or employers. From the point of view of equalising opportunities for women, it is the basic and vocational education courses which are of most importance, especially for those who in their youth were unable to complete their education.

Although there is some variation in enrolment patterns within and between countries in adult education, a differentiated pattern of participation along sex lines is clear. While women and men record essentially similar experiences in general adult education, vocational training courses are as a rule more frequently taken advantage of by men. Moreover, women tend to enrol for the short technical courses; men predominate in the longer courses.

There are many reasons for the low representation of women in adult vocational training courses as they are presently organised. Lack of motivation, problems of financing, insufficient child-care facilities and legacies of their formal education provide part of the answer. The already educationally advantaged person who can see the value of further education is more frequently found in such courses. Those of lower socio-economic status are far more likely to enter the labour market without training or with a brief course which entails the least delay between the decision to seek a job and the earning of money. They want short, practical courses clearly related to job possibilities and job advancement. Finally,

motivation may be totally non-existent for the least socio-economically advantaged and the least educated, precisely those for whom real choice in employment cannot exist without further education. Women who remain at home or work part-time in poorly paid positions, are often uninformed about alternative employment possibilities and the availability of education and training programmes prepared for them. Programmes which offer equal access alone, without special efforts to overcome low motivation, are unlikely to achieve greater equality; those already endowed by wealth and earlier educational attainment seem to be the primary beneficiaries of expanded vocational training courses.

DEVELOPMENTS IN SELECTED COUNTRIES

The status of women in education is an issue which has been widely discussed in most countries. From the perspective of improving opportunities for women, the important issue is whether their traditional position compared to men is beginning to change and what public policy initiatives are being considered to ensure greater equity between men and women in this area. While it is not possible to review policy initiatives in all OECD countries, a review of the current position in a few countries gives some indication of whether change is likely in the future. The situation in Sweden, Denmark, the Netherlands and the United States has been studied. The selection of the countries reviewed is somewhat arbitrary. An attempt was made both to include countries which had a high rate of labour force participation by women, and at least one country whose rate was low compared with other OECD countries. The governments of the four countries reviewed attached importance to increasing opportunities for women, and consequently illustrations of educational initiatives contributing to this policy goal were likely to be found. While not necessarily transferable, their experience is likely to be of assistance to all countries seeking to change the pattern of women's participation in education.

In many countries, the educational system and the various types of institutions which make up this system tend to be somewhat isolated from changes occurring in society. The extent of this isolation obviously varies from country to country. Despite the trend towards a more responsive attitude on the part of education institutions, educational systems are frequently slow to initiate major changes from within. In all countries various levels of government set a general policy within which educational systems operate, and in many countries the consumers of the educational service have

begun to play an increasing role in the development of educational policy and procedures.

The Role of National Commissions

Each of the countries under review has or had a national commission engaged in revealing inequalities in the status of men and women, calling the attention of the authorities and the public to these problems, and suggesting remedies. (1)

The first of these was established in the United States in 1961. The President's Commission on the Status of Women was established in response to the growing concern for improving women's rights in many areas of American life. The report of this body, which held that discrimination against women both as educators and as students or potential students remained a basic fact of American life, provided the impetus for much of the subsequent United States legislation affecting the education of women.

In 1965, the Prime Minister of Denmark appointed a Commission on the Position of Women in Society with a mandate to "examine the position of women in society and against this background to put forward suitable proposals, perhaps in the form of legislation, with special regard to creating actual equality for women in all areas of life and society" (2). The Education and Training Committee subsequently appointed by the Commission was given the task of examining the existing educational structure and the curriculum to see whether it limited girls' independence and inclination to obtain training and education. It was also asked to explore the problems of guidance and training for women.

In 1973, a series of proposals was submitted by the Education and Training Committee to the Ministry of Education. Its responses to each recommendation are included in the final report published by the Commission in 1974. Several proposals affecting women's participation were made by the Commission.

Proposals concerning vocational guidance, the development of a comprehensive system of training opportunities for girls and women, and the inclusion of vocational guidance in the primary school curriculum were made to the Ministry of Education which agreed to expand educational facilities for guidance and counselling.

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(1) For other aspects of the work of these and similar bodies, see below pages 90 - 94.

(2) The Position of Women in Society, Final Report by the Commission appointed by the Prime Minister concerning the Position of Women in Society, Copenhagen, 1974.

As a result of the Commission's work, legislation now eliminates the requirement that a trainee period in housework be a prerequisite for admission to training as a nurse or kindergarten teacher. The Ministry also agreed to take action to assure equal participation of males and females in teacher training colleges as one way of breaking down the traditional sex role concepts inculcated during a child's school career. Other actions taken as a result of this report included: eliminating upper age limits for certain training programmes in order not to exclude women who wished to re-enter the labour force; offering special conditions to more mature applicants for the higher preparatory examination; offering courses in local facilities for adult women whose schooling was interrupted; and increasing the number of training facilities for child-care personnel to overcome the present shortage.

In Sweden, the Prime Minister appointed an Advisory Council on Equality between Men and Women in 1972. It operates under a mandate which is very similar to that of its Danish counterpart, but the actual work of this Council is more project-oriented than deliberative. In 1976 the Council was transformed into a Commission on Equality between Men and Women comprising representatives also of the opposition parties. The Commission still has close links with executive power. It functioned internally by putting forth proposals in connection with budget estimates and the drafting of government bills. It operated externally by exercising pressure on, for example, the municipalities responsible for building additional day-care centres and other services. The Commission also proposed specific legislation designed to enhance the status of women generally. As a reference group the Commission has a special advisory board headed by the Minister of Labour and comprising representatives of different organisations and authorities.

Labour market policy in Sweden has always been based on the principle that the same measures are to be taken on behalf of men and women. In practice, however, according to the Commission, this fundamental principle has not resulted in equality between the sexes because in terms of behaviour, attitudes and initial advantages, women differ from men. The Commission therefore advocated some specific measures for a transitional period during which training would be provided to improve women's weak position in the labour market. The Minister of Labour's response to one of these proposals clearly recognised the inter-relationship between labour market and educational policies affecting women, when he stated that "the labour market sector is a suitable sector for constructive experimentation because it is here that the traditional values

and prejudices concerning the sex roles are most blatantly in evidence". (1)

By order of the Netherlands Government, the National Advisory Commission on Emancipation was established in December 1974 for a period of five years. Its function is to promote the emancipation of women by drawing attention to problem areas and suggesting appropriate remedies. Before it expires, the Commission is to submit proposals for a permanent advisory body on emancipation. The Commission is to address itself primarily to education, the traditional pattern of sex roles, labour market, legislation, social security and the psychosocial development of children.

Within the past year, the Commission has outlined an extensive and ambitious list of tasks which includes: participation of women in the labour market, equal pay, legal marriage contracts, a reformed educational syllabus, the development of guidance programmes for school girls, nomenclature of children and married women, stimulation of fathers' involvement in children's birth and upbringing, support for Ombudswomen. In addition, the Commission seeks to eliminate stereotypes in the media by studying the psychosocial influence of limiting role patterns. The relevant Ministers have agreed to respond to these recommendations.

This review of the developments in selected countries suggests that the Commission with broad representation is an extremely useful approach to initiating change within the educational system and relating changes to other areas of public policy.

Developments in Secondary Education

It has been argued above that the limitation on occupational aspiration, which is often as effective a barrier to equal employment opportunities as constraints in the labour market, starts in childhood with many factors contributing to sex stereotyping. The main emphasis in this section will be on secondary schools where most career choice have to be made.

In Sweden, the use of a non-sexist curriculum in schools has been imposed by law. Towards the end of 1970, the Swedish National Board of Education initiated the "sex roles project", one aim of which was to uncover and eliminate the factors in school and society which nourish ingrained sex role patterns. The report of that project (2) was completed in May 1975 and distributed throughout the educational community for comments and suggestions. As a result,

(1) Riksdag: 1974:1.

(2) A Freer Choice, Sex Roles Studies, Equality Programme for Schools. Report and proposals from the National Swedish Board of Education, 1975.

teacher in-service training programmes were instituted in the autumn of 1976. Suggestions from the report have resulted in government instructions to the National Board of Education to revise the systems of optional subjects and practical vocational orientation in order to make these less sex-bound. One of the curriculum changes considered is the compulsory introduction of technical subjects for both girls and boys. Furthermore, a new Commission of Enquiry has been appointed which will among other things make a thorough examination of the measures required to ensure more balanced recruitment of girls and boys to different upper secondary school subjects.

Curriculum changes and the programme for training teachers and preschool staff are designed to inject non-sexist attitudes into the school and home atmosphere so that they can become established early in childhood.

The Ministry of Education in Denmark is increasingly concerned with the "bridge" between school and work, and is examining vocational training and access to first jobs. In line with this, the Ministry of Education, through a parliamentary resolution introduced in November 1975, has requested that the Danish government implement a project to offer everyone three additional years of schooling beyond the compulsory nine-year primary school education. The principal aim is to increase the educational level of all groups. A further motive is to provide girls with a longer, more practical education to strengthen their capacity for and interest in further education or career training. The target group is therefore the 16-19 year-olds, although ultimately it is proposed to make these additional school years available to all who have had only nine years of education.

The newly developed Basic Vocational Training Courses (EFG) are designed to supersede the traditional apprenticeships and will include one year of general education prior to selection of a particular trade. Despite the adherence to traditional patterns of career choice, there is a trend in Denmark towards greater equality of status and treatment for the sexes in the educational system. The new EFG system promises to show that traditional patterns can be changed by education. The foundation year is designed to neutralise the familiar patterns of selection determined by sex. Already, more girls seem to be continuing their training after EFG than after the old apprenticeship training.

In the age groups 15 to 19 and 19 to 24, the enrolment rate for girls in the Netherlands is one of the lowest among OECD countries. This is fostered by the traditional structure of the school system in which, after the end of compulsory schooling at the age of

15, girls typically choose a short vocational preparation in "domestic science".

However, the Minister of Education has recently published a discussion memorandum outlining the possible future development of the entire education system. (1) Comments on the memorandum have been widely solicited and are now being taken into consideration. The authors of the memorandum stress that the school and the home environment should be brought closer together to ensure that education and upbringing reinforce each other as much as possible. The need for reform of the education system itself is also highlighted:

> ... in the short term, there must be an attempt to break the roles traditionally assigned to boys and girls. Attention must be paid to this point in curriculum development especially. In the long run, the education system will have to undergo structural reform if a more 'objective' distribution of social opportunities is to be achieved. (2)

As part of the reform, selection of educational careers at an early stage is to be avoided: it is proposed that these decisions should be postponed to the fifteenth or sixteenth year. There is little doubt that if this proposal is implemented, it will greatly broaden educational and career choices for girls.

A joint task force of the United States Department of Health, Education and Welfare and the Department of Labour has recently been established to focus on the bridge between school and work. The Women's Bureau of the Department of Labor will be responsible for issues connected with the pre-career awareness of high school girls. The aim is to change what is called "the Cinderella syndrome", referring to a common attitude among girls towards work and a career, and to prepare them for the likelihood that they will outlive their husbands.

The traditional sex segregation of vocational high schools in the United States has been a great source of difficulty in providing adequate vocational education for girls. Sex-segregated schools violate the 1972 Educational Amendments (3) and as a result of complaints, separate schools have gradually been eliminated. The

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(1) This has been the subject of an OECD Educational Policy Review, now published under the title: Netherlands, Contours of a Future Education System, OECD, Paris, 1976.

(2) Contours, page 21.

(3) Title IX of Educational Amendments of 1972, (Higher Education Act) 20th US Congress 1681-86.

importance of integrated vocational schools and training programmes has been documented by numerous studies which indicate that, just as in other countries, the jobs girls are trained for are not only restricted in range but also represent the lower paying occupations. In one school in Boston in 1972 the expected wage rates for trades taught to girls were 47 per cent lower than the rates for trades taught to boys (1). Of the 11,602,144 participants in vocational education in 1972, 55 per cent were females. However, 73.4 per cent of all women enrolled received training in either consumer and homemaking (45.4 per cent) or office (28 per cent) occupations. By contrast, 58.4 per cent of the male students received training in technical, industrial or agricultural skills (2).

Despite the efforts of private foundations and university centres, which have sponsored experimental and pilot projects to stimulate changes in the training programmes, the old pattern persists in the area of vocational education. It is hoped that the discriminatory structure of this kind of education will give way when faced with the withdrawal of federal funds if such discriminatory practices persist.

Developments in Higher Education

It is in higher education that women in most OECD countries are most seriously under-represented. This section gives an overview of recent trends in this field in the four countries concerned.

As a result of the decline in overall university enrolment in Sweden during the early 1970s', universities are currently recruiting new groups and offering new courses. A government policy to encourage adults to participate in recurrent education programmes has been implemented recently by a provision of study grants to those over 25 years of age who have had at least four years' work experience. As a result, there has been an influx of adults into universities: 40 per cent of current new entrants are over 25 years of age. Moreover, demand for traditional university subjects has diminished, while that for more practical and vocational subjects has grown. Fewer older students finish their university education than their younger co-students, but these courses, often given in the evening to attract part-time students, do have the advantage of offering university level education, especially to parents who, because of inadequate child care resources, could not otherwise go

(1) Marcia Federbush, Let them Aspire, Report of the Commission to Eliminate Sexual Discrimination in the Public Schools, Ann Arbor, 3rd Edition, January 1974.

(2) Summary Date: Vocational Education, Fiscal Year 1973, Washington Directory of Vocational and Technical Education, 1974.

to school. The development of this type of recurrent education was also designed to help women join or re-enter the labour market after the childbearing years.

Surveys in Sweden suggest that there is an inverse relationship between the distance of the university from their home and women's enrolment in classes. The current emphasis is on the development of a decentralised university system in which small units of higher education will be set up throughout the country. The system, inaugurated in 1977, is expected among other things to facilitate women's access to higher education. Several years ago Swedish universities initiated a programme to bring instruction to students in their homes. "Distant education" by correspondence, telephone and electronic tape equipment has been in existence for the past four or five years and is moderately successful, particularly for parents who do not have adequate child care facilities.

One of the circumstances that have contributed to the increasing enrolment of girls and women in secondary and post-secondary education in Sweden has been government financial aid to students. Those under twenty years qualify for a study allowance equivalent to the general children's allowance. In addition, low-income families may qualify for a subsidised loan and special assistance is available to those who must go away from home to study. Financial support to persons of twenty years or over is payable in the form of a study allowance supplemented by a low interest loan. Student parents qualify for an additional loan. A student couple with children - it is now fairly common in Sweden for undergraduates to have children - can live quite comfortably on their study allowance, child allowances, rent allowances and loans received during their school terms. Other study grants are tied to labour market training programmes.

In Denmark a recent change in higher education is that both men and women are increasingly choosing to study the humanities. This represents a significant increase in interest in careers such as teaching, social work and other caring occupations on the part of male students who will compete in a field hitherto dominated by women.

In the Netherlands, no direct measures are currently being taken to increase the participation of women in universities. The main emphasis is at the secondary level, where the proportion of women who complete their studies is relatively low. One proposed innovation is the "Open School", designed to promote recurrent education for three target groups: the disadvantaged, women who have completed one or two years at most of secondary education and older workers who are undereducated or trained in skills which have

become obsolete. The Open School is still in the course of preparation and although the final goal is a system of recurrent education for all, the current experimental projects are directed towards a second chance for the disadvantaged.

In 1971, testimony before the United States House of Representatives Committee on Labor and Education in the pervasiveness of discrimination against women in education was widely discussed. These hearings were influential in shaping the Educational Amendments of 1972 which prohibited discrimination on the basis of sex. The regulations implementing these amendments state that "no person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education programme or activity receiving Federal financial assistance". This prohibition applies to every educational institution which receives federal funds - preschools, elementary and secondary schools, vocational schools, colleges and universities. Sex discrimination is prohibited in all areas: admission of students, treatment of students once they are enrolled, and employment practices of an institution.

Most schools can no longer legally discriminate on grounds of sex in admissions. Public coeducational undergraduate schools, all graduate and professional schools (whether public or private) and all vocational schools must have sex-blind admissions. The statute, however, specifically allows single-sex and private undergraduate colleges to continue to discriminate in admissions on the basis of sex under specified conditions. Many schools and colleges which are not private, however, have traditionally had quotas restricting the number of women admitted. Such practices are now illegal. Consequently, there has been a dramatic increase in the number of women in medical and law schools since 1972 and this is attributed to the enactment of the law and the threat of enforcement.

The United States Office of Civil Rights has the responsibility for enforcement of this, as well as other anti-discrimination legislation, and is currently severely overloaded by the growing volume of complaints. However, experts working in this area are of the opinion that this law will prove effective and that a requirement for self-evaluation will uncover overt discriminatory policies. Consequently, the inherent force of the law is most important. The law provides an opportunity to press for change by instituting a legal right to obtain it, and suits filed under this law are likely to increase public consciousness of the problem.

Many higher education institutions in the United States have shown interest in women's issues by establishing institutes and programmes dealing with women's studies. While these have undoubtedly

publicised the importance of the issue, it is uncertain whether they have changed the pattern of enrolment of women in education.

Developments in Labour Market Training and Adult Education

The increasing participation of middle-aged women in the labour market poses new problems for adult education and training. As more women enrol in vocational training programmes, it becomes important that these programmes should be readily available and that an effort be made to motivate women to enrol in non-traditional programmes. Recent measures in some countries have attempted to motivate this group of women to further increase their participation in adult education and training.

In Sweden the public labour market training programme is an important instrument for solving employment problems and plays a central role in the task of achieving equality between men and women. In 1975, 55 per cent of those who started labour market training were women.

As a result of a recent reform the training grants to participants are somewhat higher than unemployment benefits and cover almost the whole loss of income which the student suffers. For those who previously had no income a grant is paid that constitutes a real training stimulus. Grants are no longer means-tested against a spouse's income. Eligibility covers those who are or risk becoming unemployed and who cannot find permanent work without this training. Certain courses that train for trades where labour is in short supply are also open to those who have left employment with a view to undergoing training. Enrolment priority for these courses, which have recently been expanded, goes to those who have a weak position on the labour market or are badly-paid. This is of special assistance to women, who account for a high proportion of such workers.

Within the labour market training programme there are, in addition to vocational training courses, required parallel courses in Swedish, English, mathematics, physics, chemistry and civics. The aim of these courses is not only to prepare for the specialised vocational training but also to improve the level of general knowledge of the participants and in that way strengthen their position on the labour market in the long run. As women form a high proportion of those who did not complete their education, these courses are of particular value for them.

Apart from labour market training there are also other forms of adult education. Since 1975 a new kind of training grant is offered for such studies. These grants are intended primarily for those who have had incomplete schooling and long occupational experience or years devoted to the care of children at home. This

form of "outreach" is especially attractive to women since grants are no longer means-tested against a spouse's income.

In 1974, as an incentive to non-traditional employment, a special training "Equality Grant" was made available to employers who, with a view to subsequent employment, train men and women for jobs dominated by the opposite sex. The grant is paid to the employer for each person trained for a maximum of six months. A pre-condition is that there must be a local shortage of labour in the trade in question.

Even before the introduction of the "Equality Grants", the government initiated an experimental programme to train women in traditionally masculine jobs. In 1973, Kristianstad County was selected as the site of a pilot project on the basis of the high demand for labour, combined with a high rate of unemployed women in the area. There were abundant employment opportunities in the metal and wood-working industries, but unemployed women did not consider those jobs to be "woman's work". Devised by the Advisory Council, the project involved a three-pronged effort to convince (i) employers to try hiring women; (ii) women to accept group training for these non-traditional jobs; and (iii) male workers to accept women co-workers. The results of these experimental activities have been encouraging, and the programme has successively been extended to cover the whole country.

The important question, whether the programme contributes to establishing equality between the sexes, is answered by the Advisory Council in a tentative way. It is generally agreed that women's entry to the labour market is necessary in order to achieve changes in sex roles. In this pilot project, the local shortage of manpower made it possible to challenge the segregated labour market. But the possibility of assuming non-traditional working roles does not exist everywhere and roles cannot be transformed solely by good intentions. Discrete male and female roles are still inherent in the structure of public institutions and in the current social order. Other reforms are required to implement these pioneering inroads in the labour market and to provide the social supports and services needed to maintain women in the labour market.

The Directorate of Employment in Denmark works closely with the Ministry of Education to provide information on education, occupations and the labour market for use in schools, employment exchanges, rehabilitation centres, etc. Most of the material produced is neutral on the question of sex roles and there is very little special information for women. This is because in principle men and women have equal access to education and work. Similarly, there are no provisions restricting any jobs to women or men, and

since 1973 industrial agreements have ceased to include different wage scales for women and men. In practice, however, there are numerous typically female trades and typically male trades, since the traditional distribution of jobs still prevails.

Structural alterations in schools to provide equal facilities, more advanced teaching methods and open discussion of sex roles in class have been introduced in many areas to support the trend towards greater equality. Since 1967 the employment exchanges have been able to organise vocational guidance courses for adults who are considering a return to the labour market or planning to change trades. These were originally designed only for women who wanted to re-enter the labour market, but have recently been opened to men too.

The direct effect of training and guidance on the vocational role of women cannot be measured, for changes may be the result of other social and economic factors. Today about 40 per cent of the Danish work force is female. The number of married women in the labour market has risen from approximately 240,000 in 1960 to over 650,000 today, although they are still comparatively less skilled and enoy a promotional and salary level far below that of men.

In the Netherlands, traditional attitudes about the family and the role of the mother are deeply entrenched. In 1973, only six to seven per cent of women with children under four were employed. However, increasing numbers of mature women with grown-up children are beginning to seek occupations for which they need training. The Ministries of Culture, Education and Labour are sponsoring two new programmes of limited size in which a growing number of women are participating. (1)

The first programme offers employers part of the cost of training via government compensation on the basis of the unremunerative wage costs of the trainee. This is designed as an incentive to employers to hire relatively unskilled workers and thereby benefit people who require further training.

A second scheme provides reimbursement of costs directly connected with training, such as teaching materials, examination fees and travelling expenses. This is applicable to training given by government approved establishments. To date 5,000 men and 2,000 women, of whom one-third are married, have availed themselves of this benefit. The funds are available to workers qualifying for a

(1) Training Provisions, published by the Netherlands Ministry of Social Affairs, Rijswijk, November 1973.

new job, updating outmoded knowledge, or needing supplementary training.

Government action in the Netherlands to promote employment of women also includes special training projects in the sectors in which there is a labour shortage. Currently, the Ministry of Social Affairs is developing projects in the health sector.

In the United States a number of important legislative measures have been taken in the past ten years to facilitate women's access to education, employment training and employment itself, by making it illegal to discriminate on the basis of sex in acces to education and training programmes. Similar means are employed in a fairly comprehensive legal structure designed to prevent discrimination in employment (1). This approach may be appropriate when there are currently fairly high participation rates in education for both men and women. However, while legal anti-discrimination penalties are useful in initiating change, the experience in the United States suggests that it is also necessary to take positive measures to encourage women to participate in education and training programmes in which they have been traditionally under-represented. Education and training institutions are currently being urged to establish their own goals for increased participation of women, especially in vocationally oriented fields.

. The Comprehensive Employment and Training Act of 1973 contains a provision that bars sex discrimination in programmes sponsored by the Department of Labor. It provides women with equal access to job training, placement counselling and other services through programmes geared to meet community needs. A problem in implementing this Act stems from the provision which accords preference points to veterans of the armed services, who are in the main men. (In the United Kingdom there is a requirement to hire three per cent disabled persons, but this quota is subordinate to the prohibition against sex discrimination.)

. While the Bureau of Apprenticeship and Training of the Labor Department does have a requirement that all trades should establish equal opportunity standards in the recruitment, selection and employment of apprentices, there are no specific targets to increase the participation of women. The Department of Labor is, however, giving high priority to a project designed to open apprenticeships to women in non-traditional fields.

In the wide variety of initiatives taken in these Member countries, the main direction of policy seems to go beyond simply eliminating differences in access of men and women to educational

(1) See below pages 99-102.

programmes. Policies are also concerned with the labour market opportunities which women will face after their education. In this respect, positive measures are being taken to encourage women to enrol in programmes and so increase their opportunities in occupations in which they are under-represented.

POLICIES FOR EQUALITY IN EDUCATION

Progress towards equality in education varies among countries. In terms of full-time education attained by the mid-1970s within each country there were few substantial differences between young men and young women at the secondary school level. In higher education, however, the gap between the sexes was considerable. Judged on a basis of choice of a particular field of education or training, inequality between the sexes was pervasive at all levels of education. Even where equal opportunity to choose fields of study or type of training existed, young women appear to have been slow to enter fields of study traditionally dominated by men, indicating that traditional attitudes developed at an early stage in the education process have persisted. Some gradual changes in this pattern have, however, become evident in many OECD Member countries. Since about 1970 girls have begun to participate in similar numbers to boys at the secondary school level. Over the last five years, the same trend towards more equal participation also appears to have developed in higher education. In addition, a number of Member governments have made equal educational opportunities for women a major feature of their overall educational policy and have initiated measures designed to stimulate change within the educational system so that women will have more choice in their educational careers.

As has been seen, the rate of participation of both men and women in education varies considerably among countries. Those with relatively low participation rates tend to have the largest male-female differential. It is thus possible that countries which seek, as a general policy, to increase participation in education will at the same time encourage more equal participation by both sexes. However, some countries, such as France, have moved towards more equal participation, though their overall rate of participation is comparatively low.

This review of developments in women's education points to the need for Member governments to ensure that their policy goals for equality in participation and choice in educational careers are integrated with their overall educational policy.

A wide variety of measures has been introduced in Member countries to achieve a pattern of more equal educational experience between men and women. Since educational policy varies among OECD Member countries, and the rates of participation for males and females are quite different, it is likely that policy goals for women's education and their implementation will also vary. Each country's strategy will consist of a mix of programmes consistent with its present overall educational policy, including its goal for the education of women. While the emphasis of programmes may therefore be different, each country's strategy will include a number of major components which are common to most countries. Some of the components of policy will directly influence the operation of the educational system itself, others will arise from external sources and influence what happens to the participation and choices of women in education. A useful way of setting forth policies related to this pattern of participation is to distinguish between those which are directly educational and those which are non-educational but important and supportive in changing the pattern of participation.

A strategy to achieve equality in education must clearly define the aims of public policy. The current status of women in education in most OECD countries suggests that equal participation at all levels of education is now accepted as a policy goal. A more equal distribution of the sexes among fields of study at both secondary and higher education levels is necessary for the achievement of greater equality between the sexes. This is particularly important since the failure of women to penetrate the fields of study dominated by men, even though increased participation rates for women are achieved, may simply reinforce existing sex stereotypes and contribute to future occupational segregation. With this aim of equality, policies inside the educational system - structural changes, the curriculum, admissions, guidance - and those outside the system - labour market policies, reduction of role prejudice, child care - should be inspired by the need to change the quality of educational participation of both men and women, as is discussed below.

STRUCTURAL CHANGES may still be necessary in some countries, where the existence of separate schools for girls and boys tends to contribute to stereotyping and reinforce traditional social attitudes towards sex roles. Therefore, the rapid introduction of coeducation, where it does not already exist, must be considered as an important step towards the reduction of sex stereotyping. The postponement of choice between academic, vocational or technical education until later in adolescence should also be considered in order to broaden career and educational choices for both girls and boys. A further point with respect to the early development of attitudes is the

composition of male and female teaching staff at different levels in the educational system. The fact that female teachers dominate the lower stages of the educational system and male teachers the higher, probably has an impact on the development of traditional attitudes towards occupation and further education among boys and girls. Therefore, incentives might be envisaged to stimulate a more equal distribution of male and female teachers at all levels of the educational system.

An important instrument in combatting or reinforcing traditional sex roles in education is **THE CURRICULUM.** It is therefore fundamental that the goals and guiding principles of the curriculum should work towards equality between the sexes through equal treatment of boys and girls in work at school. This means not only that boys and girls should have the same curriculum, but also that the school should, through its curricular and extra-curricular activities, try to encourage the same expectations from both sexes in terms of occupational and educational aspirations. This also implies a direct attack on sex-biased textbooks, play materials and day-to-day educational practices, counteracting traditional attitudes to sex roles and encouraging pupils to discuss and question differences that exist between men and women in many fields. A possible approach to such an overhaul of the curriculum, already adopted in some countries, is the creation of a commission to combat sex stereotypes in educational practices. Such a body should ideally be composed of a broad range of interested parties, including the producers of textbooks and other materials.

There are several aspects of **ADMISSIONS POLICY** that are relevant to a strategy for raising women's participation rate and changing the quality of their participation. These aspects concern both the secondary and higher levels of education. In some countries, women have been discriminated against in admission into educational institutions, as well as admission to fields of study within an institution. In the past, a number of universities and vocational colleges have excluded women. In some cases these institutions were influential in placing their graduates in careers in industry and government. Sometimes, even when women were admitted, there was a restriction on their numbers. In most countries this form of discrimination is diminishing under the pressure for equal opportunity which has in many cases resulted in such practices being made illegal. Where it still exists it is necessary to eliminate it if governments wish to provide equal educational opportunity for women.

Within education institutions the admissions policy to particular courses of study sometimes embodies a more subtle form of

differential treatment of men and women students. Women are rarely excluded openly from particular fields of education or training. Nevertheless, there has been a tendency to organise vocationally oriented programmes at both the secondary and higher education levels so that the typical options for women emphasise education and training for the traditionally female-dominated occupations in the labour market.

In some instances education and training programmes which lead to employment as architects, engineers, some medical professions, chemists, etc. may not be available to women. Even when women do have the opportunity of entering programmes dominated by men, in most countries they have been slow to take advantage of it. This is hardly surprising, given the traditional role of women in the labour market, in education systems and in society generally. It is obvious that changing the traditional pattern of course choices by women will be difficult unless education institutions themselves change some of their practices in recruiting entrants and introduce reforms in guidance and counselling provided within the institution.

All institutions have minimum entrance requirements and in some cases acceptance is based on academic ranking in a uniform examination. The more objective the acceptance procedure, the more likely it is that women's participation will increase, other things being equal. In practice, however, other things are not equal. For example, the recruitment of students, especially at the higher education level, is rarely random nor even representative. Most institutions are selective in the process of encouraging applicants. While anyone may be free to apply for entry, and while acceptance is based on objective standards, most institutions have over the years developed a network of potential sources of the kinds of students they are seeking to attract. Obviously, if women have been a minority of entrants in the past then experience suggests that some changes must occur in the pattern of student recruitment if more women are to be attracted. Some governments have not only made discrimination in entry to education institutions illegal, but have asked higher education institutions to review their admission policy and if women are seriously under-represented, develop a plan to increase their enrolment. A strategy for changing the quality of women's education must therefore include a review of the current admission practices of institutions and include positive measures, which may include enrolment goals, to encourage women to increase their participation.

GUIDANCE AND COUNSELLING services at every level of the educational system could be strengthened and improved to combat sex-biased educational and occupational choices. Experience suggests that even

if there is no explicit barrier to young women entering the traditionally male fields of education, there are many social and other pressures within educational systems that make young women hesitate to take this opportunity. Counselling and guidance that encourage women to enter male-dominated fields of study will be necessary if governments are to achieve the goal of equality of education between the sexes. The conventional practice of providing occupational guidance to students primarily towards the end of their career at a particular school level is inadequate. Information on occupational careers should be provided at every level throughout the school experience, and the degree of sophistication of the skills taught should increase at each successive stage. If the same principle were applied to labour market information and related skills, the occupational aspirations of young women would be broadened.

To be effective, teachers and counsellors should receive training and information about labour market conditions. In particular, they should be able to provide information on the prospects and possibilities for female employment in traditionally male-dominated areas, as well as on job possibilities for both girls and boys in traditional female areas. Closer collaboration and co-ordination between educational and labour market authorities is required to provide full information to the counsellors and teachers at school level. The cooperation and collaboration of education and labour authorities are a necessary condition for the success of these programmes.

Education that is career oriented requires a larger network of guidance centres, placement agencies and industrial and agricultural schools than now exists in most countries. The development of these institutions will not only strengthen the "bridge" from school to work but help to ensure that from the bridge there is a direct path to the labour market.

In many countries, decisions concerning higher education are made at the secondary level. Therefore, counselling at this level should ensure that young women do not shut themselves out of the hitherto male dominated fields of study in higher education. Counselling is also important at the higher education level, as women tend to be concentrated in a narrow range of subjects.

The choice of a field of study in higher education is undoubtedly influenced by the student's own perception of future career opportunities but many young students are uncertain about their future course of study. Consequently, the influence of academic counselling in course selection, frequently provided by male counsellors, may be crucial if young women are to be encouraged to enter fields of study in economics, the natural and physical sciences and some of the professional programmes at university.

The need for RECURRENT EDUCATION through a flexible system, particularly important for women between the ages of about 20 and 35 who marry and bear children, is rarely met by present education systems. A system that facilitated and encouraged alternation between study and other activities would better correspond to the lives and career patterns of many parents. Some women would be best served by being given the opportunity to receive training leading to career improvement during working hours in the same way that men are often given that option. Others who seek higher education would benefit by a system that included credit for life experience, such as child rearing or home economics. More developments in this direction are taking place in higher education but provision is still well short of the ideal.

As discussed in the review of recent developments, some countries are attempting to make it feasible for women to acquire skills relevant to the labour market through a variety of approaches, such as the "open university", scheduling programmes in less densely populated geographic locations and at times convenient to women with young children. However, a system of recurrent education implies not only the possibility to alternate between education and training on the one hand, and work on the other, but also manpower policy measures to facilitate leave from work. One such measure is educational leave of absence. In Europe particularly, leave of absence has become an important new element in educational and labour market policies over the last few years (1). Its relationship to a policy of recurrent education is evident, as it is difficult to envisage how the majority of workers could alternate between education and work without some right to paid educational leave, established through either collective bargaining or legislation. But in nearly all existing cases the establishment of educational leave of absence has been linked to a certain minimum period of employment before the right is granted. Some forms of leave of absence are likely to expand during the next decade, thereby constituting new opportunities for education in later periods of life. This will create problems of equity between those who are employed and those who are not. Consequently, it is important that in the further development of rights to leave of absence, increased attention is paid to those who have discontinuous careers.

The pressure for more equal opportunity in many countries has highlighted the need for, and in some cases resulted in, new policies affecting women in many spheres of life. If these external changes

(1) See Developments in Educational Leave of Absence, Centre for Educational Research and Innovation, OECD, Paris, 1976.

are initiated, some of them will have a direct impact on the status of women in education.

LABOUR MARKET POLICIES will affect women in education in a number of ways. For example, the aim of achieving a more balanced distribution of men and women in teaching, as a way of influencing students' attitudes towards career opportunities, depends as much on supply and demand in the labour market as on reform in teacher training colleges. The need for such a policy initiative presupposes that there is some restriction of entry for men in the lower levels and a restriction of entry of women at the higher levels. There is evidence in some countries of discrimination against women in entry and promotion within higher education, but a similar form of restriction against men at the lower levels is not easily documented. The level of wages and salaries for teachers at the preschool, elementary and secondary levels in many countries obviously influences the distribution of employment by sex. This may be caused by wage rates being set well below the market rate and/or by men and women having a different preference for teaching. No matter what the reason for the present occupational distribution by sex in the teaching profession, if governments wish to encourage more men to teach at the lower levels of education, the ultimate solution lies in labour market as well as in teacher training institutions. Here, the example of Sweden might be followed, where men are offered incentives to enter training for preschool teaching. In all fields, efforts should be made to encourage men as well as women to seek training for non-traditional jobs.

Equal employment opportunity in the labour market generally, including equal pay for equal work, has an influence on the selection of fields of study made by young women. The existence of policies to ensure equal treatment of women in hiring and promotion is likely, perhaps after a time lag, to change the aspirations of young women and therefore to influence the type of educational choices they make. At the same time, if educational policy is successful in encouraging young women to enter vocationally oriented education programmes, but their occupational opportunities are restricted, changes within the education and training system will be short-lived.

Some countries have changed the traditional protective labour legislation which was designed to ensure that women's working conditions were not injurious to their health, or that they did not work in occupations which were "unsuitable". The repeal of these laws has resulted in women entering occupations which had previously been the exclusive domain of men. In many instances these changes are mainly symbolic, but they have a long-run potential impact on

the conventional sex role stereotypes and on educational career choices. Women will probably remain a minority in many occupations in such industries as construction, truck driving, aviation (as pilots), coalmining, etc., but changes in laws or regulations which restrict employment fields for women will eventually change women's attitudes about their choice of a field of education for their future careers. Such innovations should therefore be encouraged and given priority in ways which are appropriate for each Member country.

The solution to the problem of the negative influence of SEX ROLE STEREOTYPES on educational choices is frequently regarded as an internal issue to the education system. As was pointed out at the beginning of this chapter, however, the source of the problem is also found in the existence of role prejudice in society. Consequently, external policies affecting this prejudice can contribute to changes in women's choices in education. Individual attitudes are influenced by the every day environment in which people live. The role of mass communications in affecting attitudes towards prejudice has been well documented. Apparently insignificant practices with respect to job titles, sex bias in advertising, the roles assigned to males and females on television programmes which still serve to reinforce stereotypes could, by being neutralised, provide influential means for supporting the goals of government policy.

In an era of rising labour force participation of women, the increase in CHILD CARE facilities is of immediate importance to policies affecting women in the labour market. It is also relevant to increasing women's participation in education and training. In several countries, the greater fluidity of marriage relationships has resulted in a growth in the number of single parent families headed by women. While other social policies are also directly affected by this recent phenomenon, it is quite clear that, if women with young children have to support themselves, many will require further education and training. The existence or lack of child-care facilities will to some extent determine whether they can participate in the education and training on which the future economic well-being of themselves and their children depends. Child-care is likely to be of increasing importance in a strategy for equal educational opportunities, especially as more women begin to seek a "second chance" by returning to education at a later stage in their life.

The range of options included in each country's strategy will differ according to the current position of women in education. The balance among the possible approaches which make up a strategy for effective equality in education will also vary among countries.

Because of differences in educational philosophy and the current status of women in education, the strategy adopted in Germany and the Netherlands, for example, is not likely to be the same as that followed in Canada and the United States. In some countries the traditional role of women in society is much more influential in determining the educational status of women than in others. This will affect a country's approach to equality in education.

180. Despite differences in strategies, most OECD countries are initiating changes designed to increase educational opportunities for women. This goal cannot, however, be achieved by initiating reforms within the educational system alone. Changes are required in other areas of public policy. Educational changes affecting women are therefore part of a broader policy towards equality. Many countries have used commissions on the status of women with broad representation as a vehicle to initiate and coordinate change in several policy fields. Unless changes occur in several policy areas simultaneously, the goal of effective equality in education will be more difficult to achieve and, in fact, the greatest effectiveness in each policy area will not be achieved.

Recent experience in several countries has shown that it is not enough to prohibit discrimination against women in access to and choice within the educational system. While legislation protecting women's rights to equal access is frequently necessary, it is not sufficient. In fact, most of the initiatives taken by the countries reviewed emphasise the need to take positive measures to encourage women to remain in education, to re-enter education later in life and to choose fields of education traditionally dominated by men. Unless such measures are included in the strategy there is little likelihood that equal opportunity will become a reality and consequently the ability and potential skills of women will be underutilised in society.

III

ACHIEVING EQUALITY IN PAY AND EMPLOYMENT

Equality in employment between the sexes is a goal that has long been sought in Member countries, and it is reflected in different ways in their labour market policies and laws. Reaching this goal requires the achievement of certain precise objectives. At the most fundamental level, it demands equality of reward: the variety of steps taken towards equal pay for work of equal value, enshrined in a number of international instruments and national laws, will be discussed in this chapter. A second objective is equal access to all occupations and branches of employment, involving not only an end to discrimination, but also an end to the continuing differentiation on the basis of sex in preparation for employment by training and education - a question treated in detail in the previous chapter. A third objective concerns treatment within employment in matters of contract, conditions, fringe benefits, further training and promotion.

An effective policy for equality requires action outside as well as inside the labour market. The present unsatisfactory state of women's employment, in which most women workers are concentrated in a few occupations, often badly paid and insecure, has many causes: ingrained attitudes, economic structures, past and present educational shortcomings, the problems caused by family responsibilities unequally shared. This question of labour market segregation, described in Chapter I, is as important as, if not more important than, persisting active discrimination. It is one to which a serious equality programme must address itself. It is not enough, therefore, to rely on formal guarantees of equality of opportunity: the aim is effective equality in all sectors and at all levels. This means the elimination in time of sex based divisions within the labour market.

This chapter concerns itself with measures, voluntary and legal, aimed directly at achieving equality in the field of pay and employment. Member countries differ not only in the details of their policies and laws, but in fundamental approach to putting policy into action. These differences relate to variations in national needs, progress already made and social and political circumstances.

Collective barganining, while important everywhere, is in some countries the mainstay of progress towards equality, with or without legal guidelines to guarantee certain principles in collective agreements. In other countries, the state exercises an advisory and monitoring role, sometimes through its own agencies, sometimes through autonomous bodies set up for the purpose, which are able to carry out or initiate research, identify problems, coordinate action and educate opinion. Most countries have, or will have, laws requiring equality of pay and of employment opportunity, though law is not relied on to the same extent or put into practice in the same way in all countries. In some, enforcement is left to individual complainants or organisations acting through the courts. In others, official machinery has been set up to enforce laws concerning equal pay and employment opportunity. But even where countries share this approach, important differences emerge in the way it is carried out.

This chapter sets out to examine the different policies adopted in certain Member countries, with regard both to variations in the detail of measures taken and, more broadly, to the emphasis placed on each element of policy. It is not intended, nor would it be possible, to lay down an ideal programme suitable for all Member countries, for certain elements of policy that have proved valuable in one country would be inappropriate in others. It would be wrong, however, to exaggerate the differences between countries; there are signs of a degree of convergence in certain fields, stemming from the adhesion of Member countries to international organisations, such as the ILO and the EEC. Their contribution is discussed below. The aim here, therefore, is to describe various modes of action that have been adopted by Member countries, and to identify with the help of their experience the problems that have arisen and the methods that have been useful in tackling them.

THE EXTENT OF THE PROBLEM

The Persistance of Wage Discrimination

Recent statistics and studies in several countries show that women's earnings remain markedly lower than those of men, as is shown by the comparative figures given in Table 12. The differential shown was fairly consistent in all manufacturing industries in all these countries. Even in industries with a high proportion of women workers, and where a minimum wage applies, such as textiles or clothing manufacture, women made only about 70-75 per cent of men's earnings. Though the figures show some narrowing of the gap, this may be associated in several countries with a general reduction of

wage differentials due to incomes policies, and it cannot be assumed that this trend will automatically continue.

Methods of assessing the extent of pure wage discrimination underlying these total differences in earnings are controversial. Adjustments made on the grounds of experience, hours worked, productivity, qualifications, etc. are, it may be argued, proposing as causes what are in fact results of wage and employment discrimination. Adjusted figures attempting to show wage discrimination in isolation ought therefore to be regarded as minimum estimates of its extent. For example, a study carried out by Sylvia Ostry for Statistics Canada (based on 1961 data) has shown that after adjustment for differences in the work year, occupational deployment and quality of labour, the pay gap between the sexes was still 15-22 per cent. A study carried out in the United States in the late 1960s suggested that about three-quarters of the gross earnings differential was due to discrimination (1), and it was generally thought that not less than 50 per cent of the differential should be ascribed to wage discrimination. As another indication of the extent of the problem might be cited a study published in 1970 by the Women's Bureau of the Canadian Department of Labour, comparing full-time male and female workers in selected occupations who had the same educational level and age. Men's earnings nevertheless exceeded women's in 94.2 per cent of the cases. A recent French study (2) of causes of the difference in earnings between women and men took note of occupational segregation, level of qualification and hours of work. Adjustment of the gross earnings differential to allow for the first two factors reduces it from 33.3 per cent to 26 per cent (1971 figures). The difference due to working hours was calculated at 12 per cent (for factory workers) whereas the overall earnings differential was 30.6 per cent. All these studies thus appear to indicate the persistance of a considerable degree of wage discrimination, over and above the difference in earnings due to economic factors. However, it should be borne in mind that wage discrimination cannot be figured out statistically, since statistical results are always averages and the occurrence of discrimination, as such lies outside the statistical average.

In response to this problem, many Member countries have enacted laws to combat wage discrimination, inspired in part by the principles laid down by international organisations. They have also taken the

(1) Ronald Oaxaca, "Sex Discrimination in Wages", in O. Ashenfelter and A. Rees (eds.), Discrimination in Labour Markets, Princeton 1973.

(2) Study by A. Chanaud and K. Saada, in Economie et Statistiques, no. 59, September 1974.

problem into account in general policies, for example on incomes, and have encouraged trade untions and employers to act towards the elimination of wage discrimination. No-one would claim, however, that success has been total. Gross earnings differentials remain considerable, as shown in Table 12, and there is no reason to suppose that the element due solely to wage discrimination has disappeared within the last few years. Recent statistics from New Zealand, for example, show that in 1977 the male-female differential was considerably higher in the private sector than the public sector, where equal pay has been in force since 1960, thus showing the persistence of wage discrimination even where measures have recently been taken to eliminate it. Women's Ordinary Hourly Earnings were 81.4 per cent of men's in the government sector, but only 76.9 per cent in the private sector. The latter figure nevertheless showed a very large increase since the introduction of equal pay measures in 1972. An examination of the principles of pay equality and their application in practice in various countries will therefore be made later in this chapter.

Success here, however, is only a first step. As has been seen, much of the gross difference in earnings stems from a more general inequality in employment.

Inequality in Employment and Occupational Segregation

Inequality in employment, as reflected in the fact of occupational segregation, has been documented and analysed in Chapter I. That true equality involves the substantial reduction of occupational segregation is an underlying principle throughout this report. Only part of the inequality of opportunity experienced by women arises from direct discrimination against women equally qualified and equally available for work. Such discrimination has long been recognised, at least in principle, as unacceptable, and most countries have adopted measures of some kind to end it. There exists too discrimination that is less open and may be almost unconscious, and whose causes are complex. They include prevailing attitudes concerning what is 'appropriate work' for women and men, and prejudices concerning patterns of behaviour supposed to be common to women, which are still deeply ingrained in the minds of many people of both sexes. Such attitudes are reflected in unequal opportunities in education and training, which lead to girls being directed into a small number of fields at school and after school, as seen in the previous chapter, whether in universities, where technology remains almost exclusively a masculine preserve, or in apprenticeships, hardly open to young women outside such traditional trades as hairdressing. Women in the labour market, in many cases adding to these disadvantages that of unequally distributed family responsibilities, thus find themselves in a majority of cases forced to compete with each

Table 12

THE RATIO OF FEMALE TO MALE AVERAGE GROSS HOURLY EARNINGS IN MANUFACTURING, SELECTED COUNTRIES AND YEARS

	Germany (FDR)	France	Italy	Netherlands	Belgium	Luxembourg	United Kingdom
1975	.72	.76	.80	.73	.71	.60	.67
1974	.72	.76	.78	.70	.69	.57	.65
1973	.71	.77	.78	.68	.68	.55	.61
1972	.70	.77	.76	.65	.68	.58	.59
1971	.70	.75	.76	.60	.67	.57	-
1970	.69	.75	.73	.60	.67	.55	-
1969	.69	.76	.74	.60	.67	.53	-
1964	.68	-	-	-	.65	.46	-
1962	-	.75	.72	.56	-	-	-

Source: Adopted from European Economic Community Social Statistics for 1976.

other in a restricted range of occupations. Available jobs may be insecure and less than full-time. That they are on the whole less well paid is clear from the comparative statistics for male and female earnings: certain industries have come to rely on a supply of female labour that costs less and enjoys less protection. Opportunities for training, promotion and other employment benefits are on the whole inferior to those of men.

Measures to solve this problem clearly need to be more wide-ranging than those in the field of equal pay (itself complicated by the problem of occupational and industrial segregation). They also pose problems of application. There may be no ostensible barriers against the employment of women, and so merely to guarantee 'equal' access by law or otherwise has in many cases proved insufficient: individuals may be deterred by informal barriers or may not be equipped by education and training for a wider range of occupations. More positive action is then necessary, for example by encouraging employers to recruit women or men where they have been under-represented, and by encouraging people to apply for non-traditional occupations and enabling them to do so by special training programmes, as advocated in the previous chapter.

Some Member countries have found a legal basis to be necessary for such positive measures, though few have as yet gone far in this direction. Positive action programmes may be imposed directly by

the law as interpreted in the courts, required as a condition of receiving government funds or contracts, or carried out primarily through the collective bargaining process. Examples of such approaches will be considered in a later section of this chapter.

BASIC PRINCIPLES AND THEIR REALISATIONS

The principle of equality of the sexes both in pay and employment is enshrined in international conventions, pacts and directives and in national laws and other instruments of policy. A brief review of these principles and of the progress made in recent years, showing some of the variations between Member countries, may serve as a basis for discussion of the different policy measures adopted for putting these principles into effect. The long delays that have ensued between the acceptance of the principles and the beginnings of effective change in practice could be cited as an object lesson in the drawbacks of relying on the announcement of policy objectives without practical strategies for realising them.

For the last six decades at least, instruments have been formulated by international bodies with the aim of eliminating discrimination on grounds of sex. In 1919, when the International Labour Office was founded, the principle of equal pay for women was included in the list of principles set out in its Constitution. The ILO has since adopted several Conventions designed not only to achieve equal pay, but also to eliminate discrimination on grounds of sex in all conditions of employment, including training.

The development of a body of international law concerning human rights has, of course, included prohibition of discrimination on grounds of sex other than in conditions of employment. It has also established the right of all persons to employment, including married women. This principle is embodied in the recent United Nations Covenant on political and economic rights, now ratified by a sufficient number of member states to put it into force. In OECD Member countries which have ratified this instrument and its protocol, individual citizens may bring a complaint in case of infringement which may be heard by the Human Rights Committee established by the General Assembly specifically for this purpose.

There are other international instruments bearing on the status of women in the economy to which reference should be made. The United Nations Educational, Scientific and Cultural Organisation has adopted a convention prohibiting discrimination in education on grounds of sex, and the total list of instruments applicable to the status of women adopted by the General Assembly of the United Nations

and its specialised agencies is a lengthy one. There are also treaties and policy directives made pursuant to them which apply to certain OECD Member countries. For example, the signatories of the Treaty of Rome are committed to the goal of equality for women in the economic sphere. These developments are of recent date and for this reason the extent of their success cannot yet be judged.

The concept of equality as expressed by these international organisations has developed over the years, becoming wider in its scope and more precise in its terms. The ILO Declaration on Equality of Opportunity for Women Workers (1975) stressed the need to improve vocational training, placement services and supportive services, and to encourage women to apply for work in 'all occupations ... even those hitherto in practice reserved for men'. It called for equality 'of opportunity and treatment', guaranteed through legislation, collective agreements and contractual arrangements 'of binding character', with measures to apply this principle, 'including procedures for complaints, conciliation, appeals and recourse to the courts'. National administrative machinery was to be strengthened to give effect to all measures. 'Positive special treatment' during a transitional period was not ruled out; indeed, 'special measures' of various kinds, including 'positive measures' to 'stimulate the equal access of women to top positions' were specifically called for.

Many of the same principles were expressed in two European Community directives concerning equal pay (75/117) and equal treatment (76/207). The equal pay directive, which came into force on 12 February 1976, requires equal pay 'for the same work or for work to which equal value is attributed'. It applies to all aspects and conditions of remuneration. Job classification systems must be based on common criteria for men and women. The second directive, which will come into force in August 1978, concerns equal treatment for men and women in access to all posts, occupations and levels of seniority, in all training and guidance, and in all conditions of employment, including those governing dismissal. Equal treatment means the absence of discrimination direct or indirect, particularly by reference to marital or family status.

Both directives include the following requirements: coverage of laws, regulations, administrative measures, collective agreements and individual contracts; the right of all persons who consider themselves to have been discriminated against to seek redress through the courts; protection against retaliatory dismissal following a complaint or legal action; information of workers regarding their rights, for example at the workplace.

There has been real progress. Member countries as a whole have taken significant steps towards recognising the goal of equality in their laws and arrangements for collective bargaining. But

without minimising these advances, it is clear that much remains to be done before recognition of the right to equal treatment in practice, as well as to a theoretical equal access, is universal. A brief survey of the position in those Member countries that have formally declared principles of equality shows three broad groups: those that enshrine them in their constitutions, those that do so in general human and civil rights legislation, and those that do so in specific laws relating to employment. This division is adopted solely for convenience of presentation. As will be made clear, several countries fall into more than one "group".

Austria, Germany, Japan, France and Sweden provide examples of countries whose consitutions proclaim equal rights. The Austrian constitution (1919) declared the principle of equality for all citizens of both sexes. However, this had a restricted application until recent years, when specific legal changes altered the position of married women within the family and in employment (1). The Federal Minister of Social Affairs established working parties in 1977, including experts from the social partners, to review social and labour legislation so as to ensure that the effects of the most recent reforms introducing the concept of partnership will be reflected in relevant provisions. An example of changing attitudes may be seen in new criteria for layoffs and dismissals, for which in some cases comparison must be made between the social circumstances of employees to be dismissed. A recent conciliation office decision states 'a woman's right to work, even if her husband earns enough money for both of them'. In Germany, article 3 of the basic law stipulates that men and women have equal rights. This law is directly applicable. Any collective agreement violating it is null and void. Most workers are covered by collective agreements having to conform to this principle. Other laws, such as that on the Organisation of Companies, reaffirm the principle of equal rights; works' councils, among others, are charged with overseeing its application. In Japan, the constitution proclaims equality under the law and forbids discrimination in political, economic or social relations on grounds of race, creed, sex, social status or family origin. The Labour Standards Law enacted in 1947 prohibits discrimination against women in wages, and prescribes some protective provisions for women, restricting overtime work, work on holidays and midnight work, as well as ensuring maternity leaves. However, as these laws made no reference to equality in employment generally, a ten-year action plan was adopted in 1977 to promote equality of the sexes on a wider basis. Changes (in legislation) was suggested by an advisory body of the Minister of Labour, "Study Group on the Labour Standards Law". The Report of the Group on matters concerning women

(1) See below, page 98.

was submitted to the Minister in November 1978. The Report points out firstly that some new legislative measures are necessary to be undertaken to ensure equality of the sexes in employment. It also suggests that protective provisions for women workers should be limited to the reasonable minimum extent in order to ensure equality. It further says restrictions on overtime, night work and hazardous work be provided equally for both sexes, while maternity protection should be extended more favorably than current provisions. The Japanese government will proceed with the preparatory work on new legislations based on the report. The French constitution states that the "law guarantees women, in all domains, equal rights with men". While relying on the collective bargaining strategy, the government has used its authority to fix wages as a means of achieving some degree of equal pay. For example, during the wage fixing period (1946-1950), minimum and maximum wage rates were established for all workers by occupational and skill categories. As a result, after 1950, when wages were set by collective bargaining, there was a tendency for the principle of equal pay to be carried over into the new agreements. Since 1970, however, the government has moved in the direction of protecting individual legal rights to equal pay. An article of the Code du Travail (L 133-32nd) adopted on 13 July 1971, stipulates that collective agreements must include provisions which apply the principle of equal pay for equal work to women and young people. In addition, agreements must have procedures for settling any difficulties that arise from the application of the equal pay principle. In 1972, the French government passed an equal pay law, and in 1973 (Order No. 73.380), specified a complaint procedure and a system of sanctions which may be applied if the grievant's charges are upheld in court. In addition to the penalties, the employer also has to pay the higher rate of the male worker and, although the law does not provide for it, back pay was awarded in 1974 in the first case under the law. This case, which affected 53 women, was appealed by the employer. Finally, certain recent measures protect equality of access to employment. The Law of 11 July 1975 prohibits refusal to employ on the grounds of sex or family status and sex discrimination in job advertising. The law also forbids refusal to employ on the grounds of pregnancy: the candidate for employment is not obliged to disclose her pregnancy. The Swedish constitution similarly declares the equality of citizens. Sweden has gone particularly far in developing this principle in practice through a variety of social measures (training, child care, taxation, etc.), and it plans to introduce a law on equality between men and women in working life, to which further reference will be made below.

The United States, New Zealand and Canada provide examples of countries that embody the principle of sex equality in general civil

rights legislation. The United States Civil Rights Act (1964), Title VII, makes it illegal for an employer to refuse to hire, to discharge or otherwise to discriminate in any of the conditions of employment against any person on the grounds of sex, race, religion or national origin. The scope of the law was extended to educational institutions by the Equal Employment Opportunity Act (1972), which expanded the powers of the administering agency, the Equal Employment Opportunity Commission. Title IX of the Educational Amendments of 1972 prohibited sex-based denial of benefits in any programme receiving Federal finance. The New Zealand Human Rights Commission Act (1977) prohibits, inter alia, discrimination on the grounds of sex and marital status. Emphasis is placed on conciliation, though there are penalties for continuing non-compliance. Canada's Human Rights Act (1977) is probably the first legislation in an OECD country to incorporate the principle of equal pay for 'work of equal value'. However, it only covers those employers falling under Federal jurisdiction - about 10 per cent. The others are bound by Provincial legislation which defines equal pay in a variety of ways (1). The Human Rights Act also provides enabling legislation for affirmative action programmes.

A number of Member countries have set out principles of sex equality in laws addressing themselves more narrowly to the questions of pay and employment. In Finland, the Employment Act (1970) prohibits wage and other forms of discrimination in employment, though without precisely defining it. The Irish Anti-Discrimination (Pay) Act (1974) establishes the entitlement to equal pay of women engaged in 'similar work' to men. Criteria are established for judging the similarity of work. An Anti-Discrimination (Employment) Bill is under consideration. Italy enacted an equal treatment law in 1977. It forbids all discrimination in access to employment, training, promotion etc., and gives the right to equal pay for work that is similar or of equal value. The New Zealand Equal Pay Act (1972), covering the private sector, requires equal pay for 'the same and substantially similar' work; it requires, and lays down criteria for, job classification. Denmark, in response to EEC policy, adopted an equal pay law in 1976, and an equality law concerning access to employment, vocational training, promotion and working conditions. As in several other OECD countries, Denmark intends these laws to be a supplement to collective agreements. The United Kingdom passed an Equal Pay Act in 1970 and a Sex Discrimination Act in 1975, the first concerning collective agreements, pay structures and contracts of employment and the second wider issues of discrimination. One of the obstacles to equal pay, long accepted in theory, had been the lack of a suitable definition, and the Equal Pay Act attempted to

(1) See Naresh C. Agarwal and Harish C. Jain, 'Pay discrimination against women in Canada: issues and policies', McMaster University Faculty of Business, Research and Working Paper Series, No. 143 (Ontario, March 1978) pages 16-17.

set out the principle in practical terms. It therefore provides for equal pay for 'the same work', for 'broadly similar work' and for work 'rated as equivalent', job evaluation also being defined. The Sex Discrimination Act prohibits discrimination in employment, training, and education, and in the provision of housing, goods, services and facilities to the public. The Act defines 'direct discrimination' (unequal treatment in similar circumstances) and 'indirect discrimination' (the imposition of unjustifiable conditions that tend to discriminate on grounds of sex). Discrimination on grounds of marriage are similarly prohibited.

The problem of proving the connection between differential treatment and sex has sometimes been raised. The proposed Swedish law would include a special rule under which the establishment of probability would suffice. It would not be enough, of course, that first impressions suggest sex discrimination, and employers would have the opportunity of showing that contention was improbable (1).

Some Member countries, regarding collective bargaining rather than law as the major policy instrument, have not given formal, legislative expression to the principle of equality. In Belgium, following the EEC directive, a Royal Order (December 1975) made obligatory Collective Labour Convention no. 25, which embodies the principle of equal pay, and establishes means of redress in case of non-application.

There are, then, differences between Member countries in the formulation of ways in which the generally accepted ideal of equality is to be seen in practical terms. Sometimes, the need to define terms has caused problems. In the United Kingdom, for example, the concept of 'equal pay for the same work' was found to be too restrictive, as the Secretary of State for Employment and Productivity told the House of Commons in 1970, and that of 'equal pay for work of equal value' was considered 'too abstract ... to embody in legislation without further interpretation'. Hence, alternative definitions were adopted. In the United States, the Department of Labour generally avoids comparing or evaluating two apparently quite different jobs. There is no provision for job evaluation in the law, and it took almost seven years to establish the legal precedent of 'broadly similar'. A recent case provides for the evaluation of different jobs in terms of the "physical and mental effort" involved. In Finland, the Council for Equality has concluded that one reason for unsatisfactory progress has been that 'the law gives a vague and generalised definition of discrimination and thus has been frequently circumvented'.

As this survey shows, no universal set of principles of application has been clearly adopted by Member countries as a whole, and few have approached the problem of formulating all-embracing programmes for achieving equality. Effective programmes would require not

(1) Proposal for a Law on Equality between Men and Women in Working Life, Committee on Equality, Stockholm, 1978, page 13.

merely the prohibition of outright discrimination in pay and employment, but positive measures to reduce occupational segregation through vocational training, the re-examination of systems of recruitment and promotion and general social and economic measures to achieve a balanced sharing of responsibilities and opportunities in the family, the labour market and society as a whole.

While the adoption of the principles of equal treatment has suffered delays, agreement on the methods of putting the principles into practice has been even slower. Naturally, differences between Member countries are great, both in the choice of approach and in the degree of progress made.

In the choice of approaches to equality, depending on the social and political circumstances of each country, one clear difference emerges. Certain countries have been able to rely principally, and with considerable success, on collective bargaining as a primary means of achieving greater equality between the sexes. The role of the state has been mainly limited to support, through its social policies, education and sometimes regulation. In several Scandinavian countries, the national wage agreement determines all the conditions of employment negotiated through the collective bargaining system. In these countries, trade unions and employers have traditionally played a crucial role in determining and implementing social and economic policies. The national wage agreement is therefore a convenient vehicle for achieving wage equality between men and women. The use of the law as an instrument to achieve wider equality, even if meant only as a supplement to existing collective bargaining machinery, is not always welcomed, as may be seen, for example, in the dissenting opinions expressed in the report of the Swedish Committee on Equality.

The collective bargaining approach can be highly effective in countries where women workers are organised and active in union affairs, and where unions are thereby made aware of the importance of the problem of employment inequality. In Scandinavia, unions have organised extensive training programmes to develop leadership skills and have encouraged women to participate in these courses. At the same time, experience in most countries suggests that trade unions, as democratic institutions, reflect the attitudes and interests of workers in the society. Their policies reflect prevailing values and they may not always be in the vanguard of ending wage discrimination. In several countries, further measures have been considered desirable to supplement and guarantee certain principles in collective bargaining.

This has not, however, seemed sufficient in countries where regional and other variations are greater, and where unionisation does not provide satisfactory protection for all workers. One means of reducing wage inequality, important in some Member countries, is

minimum wage legislation. In France, the legal minimum hourly wage applies to all workers (men and women) over 18 years, with only a few occupations exempt from the law (caretakers and domestic workers). In Luxemburg, men and women have had the same minimum wage since 1963. There is a 20 per cent supplement to the basic minimum for skilled workers who are likely to include a higher proportion of men. In the Netherlands, there has been a single legal minimum wage for all men and women since 1969. There is a youth differential (under 23 years) and while this does not distinguish workers by sex, women tend to be over-represented among young workers compared to other age groups in the working population. Regular part-time workers (working less than one-third the average work week) are exempt from the legal minimum. This is likely to be detrimental to women, who represent a high proportion of part-time workers. While on the whole, a legal minimum wage is of indirect benefit to women, as they form a high proportion of low-paid workers, it is not of course a means towards full equality. In a number of countries, detailed anti-discrimination legislation, with machinery for enforcing it, has been found necessary to guarantee the rights of various groups of citizens. Among these rights is that of equality of treatment for women workers. The use of the law as the instrument to provide these guarantees has not been decided without controversy. For example, in the United Kingdom the Trades Union Congress passed an equal pay resolution in 1888, but only supported legislation from 1963. Until then, it was felt that collective bargaining should resolve the question, but it failed to do so. A useful summary of the role of the law in combatting discrimination is that it is an unequivocal declaration of public policy; it gives support to those who do not wish to discriminate but feel compelled to do so by social pressure; it gives protection and redress; it thus provides for the peaceful and orderly adjustment of grievances and the release of tensions; and it reduces prejudice by discouraging the behaviour in which prejudice finds expression (1).

POLICY COMPONENTS

In seeking to realise the principles of equality in pay and employment, Member countries have amassed valuable experience in the different methods of approach that they have adopted. The main variations lie in the mix of policies adopted and in the weight given to the various elements in each national strategy. Each country uses collective bargaining, but not to the same extent, in executing social policy; each country has employment laws, but not formulated

(1) Equality for Women, Cmnd. 5724, London (H.M. Stationery Office) 1974, page 4.

in the same terms or applied in the same manner. As all countries are still experimenting with the most effective set of policies, a pooling of experience, both as regards successful methods and those that have required modification, may help to identify modes of action which, appropriately applied in differing national circumstances, can prove of general value.

Three broad themes will be examined: that of collective bargaining; that of 'education, monitoring and moral suasion'; and that of the use of the law. Of course, these are not exclusive. Often they overlap: in many countries, collective bargaining is provided with legal guidelines to ensure observance of the principles of equality, while equality legislation often designates unions as agents in the enforcement machinery. Also, countries use more than one approach - some use all three. This survey is not exhaustive, and therefore it is not implied that countries cited under one heading are confined to one line of action. Countries cited were chosen because of their particular experience in one or other of the fields under consideration, and by reason of the information available.

Collective Bargaining

In countries where women workers are unionised to a high degree the issue of equal pay is usually given high priority in negotiations, even when (as is generally the case) they remain very much under-represented at decision-making levels. In recent years, the social partners have become aware of the question of employment equality, and, as the following examples demonstrate, in some countries they have laid down detailed and all-embracing action programmes.

This has been the case in Scandinavia, for example, where male-female earning differentials are narrower than in most OECD countries. In 1973, women's earnings in manufacturing, as a percentage of those of men, were 82 in Denmark, 72 in Finland, 76 in Norway and 84 in Sweden. All Scandinavian countries have sought to achieve equal pay for equal work, and these differentials have no doubt continued to narrow. Over the past decade, national wage agreements have become a means of achieving social and economic goals, including redistribution of income. In the Scandinavian countries, there has been a general desire, at least on the part of unions, to narrow wage differentials between many groups of workers. This, of course, would narrow male and female wage differentials caused by occupational segregation, even when the policy has no specific reference to sex equality.

Collective bargaining has also played a major role in increasing sex equality through specifically oriented policies. In Denmark, for

example, the government introduced a Draft Resolution to parliament proposing that equal pay should be achieved gradually over the period 1972-76. The development of a programme to reach this goal was, however, left to the social partners, since the government did not press for the passage of any equal pay legislation. The social partners responded, and the 1973 national agreement between the Workers Confederation (L.O.) and the Employers Confederation (D.A.) abolished all discrimination in wages, including differential piece rates based on sex. The 1973 national agreement included a number of specific features affecting particular industries at both the national and local level. It also covered all public employees and set the pattern for wage rates for men and women in firms not affiliated with the Employers Confederation. The 1973 national agreement in Denmark, therefore, represents a clear example of the major role which the social partners can play in determining and implementing the details of social policy, once the government has outlined the broad objectives.

In Sweden too, the reduction of male-female earnings differentials in the private sector - by about 1 per cent per annum since the beginning of the 1960s - has been due both to the elimination of separate wage rates for women workers from collective agreements in the first half of the 1960s, and to the solidaristic wage policy that the Swedish Confederation of Trade Unions (LO) has pursued during the last 15 years. The object of this policy is to narrow pay differentials between industries and within firms in favour of the low paid. In white-collar areas the improvement of the ratio of women's pay to that of men is a result of a deliberate policy on the part of the salaried unions in differentiating contractual increases in favour of women. This difference has been larger than the sex difference in salary drift. The efforts to reduce earnings differentials between men and women in the public sector have followed a somewhat different pattern. The principle of equal pay in the narrow sense of equal pay for employees doing exactly the same job was established by 1925. Large pay differentials have continued to exist, however, due to the well-known fact that men and women as a rule do different jobs. Only after the public employees were given the right of collective bargaining in 1966 did this begin to change. As in the private sector central wage agreements arrived at in recent years for the public sector have given priority to low wage groups and have thus particularly favoured women. Changes include the amalgamation of promotion systems carrying different salary benefits applied to jobs that could be considered to be of equal value. The more advantageous promotion systems had been applied to jobs heavily dominated by men.

The concept of employment equality as reflected in recent collective agreements in Sweden is a developed one. They make specific reference to ILO Conventions 100 and 111, and set themselves the objectives of reducing earnings differentials based on occupational segregation, and also working to break down segregation itself by 'offering women opportunities for employment and training equal to those enjoyed by men, and the same opportunities for meaningful work with responsibility'. It is recognised that arrangements should be made for men and women to combine a job outside the home with responsibility for a family. Also 'particular emphasis' is placed on the responsibility of supervisory staff and work colleagues in helping to break down traditional attitudes concerning job segregation.

The means laid down for carrying out these objectives, at both central and local level, included 'planned and purposeful measures' through the drawing up of a personnel policy in respect of external and internal recruitment and training. It is clearly laid down that 'special treatment' during a transitional period is not to be regarded as discriminatory. This may include special training or advertising for persons of the under-represented sex, and 'preference in favour of persons of a particular sex in recruitment or training where candidates are in other respects equally qualified'.

The social partners have also set up machinery for promoting equality, in the form of an Equality Committee made up of representatives of the employers' and white-collar workers' federations. Its functions include monitoring activities, initiating pilot projects to promote quality within companies, giving advice on education, training and careers, and maintaining contacts with official bodies. It also serves as an arbitration committee in case of dispute concerning the execution of the agreement. A list of suggestions for pilot projects has been drawn up, concerning recruitment, training, working conditions (to remove hindrances to sex equality and to the breakdown of segregation), services (working hours, child care, transport, etc.) and the gathering of information and statistics (including absences from work, interest in training, parental leave, job distribution between the sexes, and the monitoring of the progress of workers in non-traditional occupations) (1).

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(1) Details concerning negotiations between the Swedish Employers' Confederation (SAF), the Swedish Confederation of Trade Unions (LO) and the Federation of Salaried Employees in Industry and Services (PTK) in March and April 1977 are taken from SAF Documents Nos. 116, 121 and 1097.

In a number of other countries in which action by the social partners is central to the achievement of equality between the sexes, governments have found it desirable to take measures to ensure that certain norms are adhered to. Sometimes, this has been in response to international agreements. In Belgium, for example, application of the EEC equal pay directive took the form of a Royal Order (12 December 1975) which made obligatory Collective Labour Convention No. 25. This concerns pay equality between male and female workers, and guarantees the right of redress and protection to workers who institute an action to have the terms of the convention executed. The Commission on Women's Labour, a consultative body under the auspices of the Ministry of Employment and Labour, has had a systematic analysis of all sectoral collective agreements carried out so as to discover direct or indirect discrimination contravening the National Convention no. 25. The results of this analysis have been placed before the social partners.

In Austria too, the Federal Ministry of Social Affairs, in co-operation with the social partners, has ordered a comprehensive study on possible discrimination still existing in collective agreements.

In Germany, men and women performing the same work, or work recognised by the parties to collective agreements as being of equal value, are placed in the same wage or salary scale under the agreement. The Constitution nullifies any collective agreement violating the principle of equal rights. However, problems have arisen due to wage differentials between types of work in certain industries. For example, 'light work' is paid less, and although not reserved for women, it is largely performed by them. As a result, the Federal Government suggested research on the scientific organisation of work in 1975-76, so as to bring up to date the classifications of 'light' and 'heavy' work. The government hopes that this will improve the situation of women in the lower wage categories.

Education, Monitoring and Moral Suasion

To achieve true equality in economic and social life requires a multitude of changes in the fabric of our social and economic systems, and, perhaps most important of all, a change in attitudes. This, in the long run, could be considered the key to full and equal partnership of women and men in their social and economic roles. The education of public opinion, coordination between groups and organisations concerned, and consultation between experts in the various fields are therefore essential. Several countries have found it valuable to make use of intermediate public bodies or specialised units of various kinds, some official, some non-

governmental, to help put policy into effect. Their activities include making recommendations on government policy, carrying out research, monitoring changes, counselling and encouraging individuals and corporate bodies, responding to and educating public opinion, producing ideas and examining collective agreements (1).

In Germany, works councils are given a special role by law in ensuring that the principle of equal treatment, which must be respected in collective agreements, is carried out at workshop and office level. Contraventions can be taken before the labour courts. The various employment services - placement, training, etc. - have adopted a range of measures to widen the field of employment open to women. They include information to both workers and employers to try to remove traditional prejudices, training and retraining outside the conventional occupations, including financial incentives to employers to train young girls and special measures to retrain unemployed women. It is hoped that the horizons of employment for women will be progressively widened, with the aid of a large-scale campaign of persuasion at all levels of society.

A similar task is performed in Australia by statutory discrimination committees at both state and federal level. Their object is to remove discrimination in employment and occupation through conciliation. It is usual practice for these committees to negotiate with the parties separately in case of complaint. This is seen to create a less disputatious atmosphere and it enables greater scope for compromise solutions. Complainants are at all times made aware of responses to their allegations by the organisation or person complained against. Three states have back-up legislation that may be invoked if the conciliation procedure does not produce a satisfactory solution.

A number of Member countries have set up bodies with a wide range of action over employment and other fields. Three of them will be examined here: Japan, the Netherlands and Denmark.

In 1975, the Japanese government set up the Headquarters for Planning and Promotion of Policies Related to Women, in an attempt to incorporate into national policy the plan of action adopted by the World Conference on International Women's Year, and to implement comprehensive policy measures concerning women. In 1977, the Headquarters formulated a ten-year national plan of action, after consulting non-government specialists. It aims to improve the legal status of women and accelerate equal participation in all fields. Existing laws are being examined with a view to removing obstacles to equal treatment, such as obsolete protection measures.

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(1) Those bodies whose main function is enforcing equal rights legislation are discussed in a later section.

In Austria and Canada a prime concern is vocational training. The objectives set by the Tripartite Subcommittee of Labour Market Policy for Women and the Women's Division of the Austrian Federal Ministry of Social Affairs have promoted the participation of women in labour market training, using the provisions and subsidies of the Promotion of the Labour Market Act (1969). Women workers thus represented one of the priorities of the annually-formulated labour market programmes, and consequently of the Report of the Government on the Economic Situation in Austria. As a result, between 1971 and 1975, the participation rate of women in such training was consistently higher than their participation rate in the labour force. Longer term programmes have been established to help women reach skilled worker status. Training courses leading to apprenticeship certificates for women previously employed as semi-skilled or unskilled workers have been provided, with subsidies under the above-mentioned Act. The legal requirements for apprenticeship qualifications have been modified in accordance with the need of these workers. Another programme began, in 1977, to combat the segregation of the labour market by training girls as 'technical pioneers'. Such programmes were given valuable support by the example set internationally by Women's Year. In conformity with the objectives of the United Nations Women's Decade, contact officers have been nominated in each of the nine labour market exchange offices in the nine federal states of Austria. The Canada Employment and Immigration Commission has a number of priority training programmes for women, including in some provinces special pre-trades training, involving experience with tools and machinery and confidence building. Each Canada Manpower Centre has designated a counsellor to promote the industrial training of women, especially in non-traditional occupations.

The Netherlands government set up a National Advisory Commission on Emancipation in 1974. It is intended to replace this commission with a permanent advisory body when its mandate expires. Among its tasks are the examination of the labour legislation and promoting the participation of women in the labour market. However, the commission also devotes itself to wider aspects of equality, for example in the family, education, training, social security and the problem of sex stereotyping.

Denmark has particularly long experience of this type of action. A commission was appointed in 1965 to study the status of women in society, and one of its recommendations was to establish the Danish Council on Equality, set up in 1975. Its president is nominated by the government, and its seven members include representatives of

employers, unions and, the largest number, women's associations. It is financed by the Prime Minister's department and has a secretariat provided by several ministries. Its functions are to review social developments and propose measures to eliminate causes of inequality; to act as an advisory and co-ordinating body to local and central government; and to promote research and information. The Council can act by request or of its own accord in cases of discrimination against groups or individuals, and makes proposals to the competent authorities. An important part of its task is communication with the public, through the press, broadcasting, seminars and conferences.

In 1976, a study by the Council of women's membership of official councils, committees etc. led to a request being made by the Prime Minister that more equal representation of women and men should be established. Progress is being reviewed. The Council has also given attention to the participation of women in vocational training. Acting on a Council recommendation, the Minister of Labour has alerted training establishments and employment exchanges to the need to increase and broaden participation. The Council has also been involved in preparatory work for an Equality Bill, regulating access to employment, training, promotion and working conditions. The Council has formulated a plan to relieve unemployment among women. So far, several of its measures have been adopted, including the establishment of courses for the long-term unemployed. One of their purposes is to restore self confidence to unemployed women and convince them that the labour market belongs to them too. A further result of the plan will be the increase in the staff of employment exchanges, which will include special advisers for unemployed women.

Among matters now being studied by the Council are proposals concerning the family, problems of spouses working in family businesses, revision of marriage legislation, the investigation of cases of rape, sex stereotypes in advertising and education, and several joint research projects. The Council acts by means of research, coordination of departments, and education of opinion through schools, the mass media etc. The Council remains in close contact with its international counterparts operating under the Council of Nordic Ministers, the EEC and the United Nations.

As experience in several countries has shown, an effective policy must range widely, touching on many aspects not directly concerned with equality of treatment in employment. Co-ordination is therefore of the first importance. Specialist research is needed in many of these fields, both economic and social, as is constant monitoring of the effects of social and economic changes on the individual, the family and progress towards equality. Perhaps most important of all, education, in the broadest sense, of public opinion,

employers and workers, is needed if progress is to be real. In all these matters, bodies such as those described appear to have offered important advantages to those countries which have made use of them.

The Use of the Law

Mention has already been made of the basic principles that various Member countries have embodied in law. The question to be examined here is the practical experience they have obtained in applying laws, the details of which necessarily vary according to conditions and constitutional systems. As most Member countries have introduced, or are considering, legal measures to ensure equality in employment, a comparative survey is of value.

Some Member countries with laws on equality of pay and employment require that in case of legal action the individual complainant should take the initiative. Others leave the union, in normal circumstances, with the responsibility of taking the matter before the courts, if the usual channels of collective bargaining do not produce a satisfactory solution. Clearly, in these countries, the law is not considered to be the main instrument of public policy, but rather, at most, a supplement to be invoked in a few extreme cases. Reference has been made to some of these countries in the section dealing with collective bargaining. Here, consideration will be given to those countries that use the law as a prime instrument of policy. As a result they have developed special machinery for receiving and investigating complaints and for seeking solutions either through conciliation between employer and employee or, where necessary, by taking the matter before the courts. Although individuals and trade unions play an active role, the statutory bodies can themselves in case of need take the initiative and carry the whole burden. In cases of workers who are not unionised, whose bargaining position may be weak and whose resources of time and money are limited, this system has clear advantages. An examination of those countries with experience in this field will show the effectiveness or otherwise of certain procedures, and also modifications that have proved necessary in the light of experience.

As a preliminary step, it will be necessary to revise existing labour laws, for example those providing protection for various groups of workers, so as to determine in the light of modern developments which remain necessary and which constitute a form of unwarranted discrimination.

The application of laws on equal pay will be examined first, and then that of laws concerning the wider aspect of employment equality.

In Canada, there are both Federal and Provincial laws on equal pay, though the precise scope of the law is not the same for work of equal value; provincial laws, which cover most workers, speak of an equal 'rate of pay', or 'wages', or 'wages and benefits' for 'the same work', or 'similar or substantially similar work', or 'substantially the same work performance of which requires equal education, skill, experience, effort, responsibility, and working condtions', etc. (1). Equal pay legislation has apparently as yet had little impact on female wage levels. One reason may be that the imprecision or restrictiveness of certain provincial laws makes them easy to circumvent. Also, the number of complaints received, which initiate investigation processes, has been low (2). Ignorance of the legislation, lack of resources and fear of reprisals may have contributed to this. The fragmentation of resources has also been a handicap. Under the recent Federal legislation, the Human Rights Commission will have as one of its functions the enforcement of equal pay legislation in cases falling under Federal jurisdiction. An individual or group of individuals may file a complaint, or the Commission itself, if it has reasonable grounds for believing that a person is engaging or has engaged in discriminatory practices, may initiate a complaint. This is investigated and a report made. If the complaint is not settled, a conciliator may be appointed. A Human Rights Tribunal may be appointed at any stage to enquire into a complaint.

Ireland enacted the Anti-Discrimination (Pay) Act in 1974. This provides that if a woman is doing similar work to a man in the same place of employment, she is entitled to equal pay. The Act specifies criteria for determining "similar work". It also sets up an enforcement mechanism which permits equal pay officers to enter work places to inspect records, etc. Complaints are initiated by individuals, who are protected from employer retaliation. When the employer is found to be violating the Act, redress consists of subsequent payment to the complainant of the same rate as the counterpart male. The complainant is also entitled to be awarded arrears of remuneration, subject to a maximum of three years arrears back from the date on which the dispute was referred to the Equality Officers for investigation.

Similarly in Japan, labour inspectors are responsible for enforcing the Labour Standards Law (1947). This prohibits

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(1) See Agarwal and Jain, 'Pay discrimination against women in Canada', pages 16-17

(2) Agarwal and Jain, 'Pay discrimination against women in Canada', pages 10-11, citing recent studies and an earlier report (1970) of the Royal Commission on the Status of Women in Canada

discrimination in wages on the grounds that workers are women, or that, according to social concepts, or in general or on the average in certain enterprises, women are less productive, work shorter periods, have fewer family members to support etc. Inspectors have the power to order employers to pay women workers the same wages as men. The law provides for fines or, theoretically, imprisonment for offenders.

In New Zealand, equal pay has been in force in the Government Service since 1960. This did not, as was hoped, provide an example followed by private employers. An Equal Pay Act to cover the private sector was passed in 1972, and full implementation through five stages was reached in April 1977. The Act required job classification according to the work performed, and equal pay for work requiring the same or substantially similar job conditions. During the phase-in period, wage awards were progressively adjusted, and after 1977 male rates were applied to women. New awards may not include separate rates. The Act applies to all wage rates, payments, bonuses, allowances, fees, commissions and fringe benefits. Implementation of the Act was monitored by a half-way review. A final Equal Pay Review Committee, convened 1 August 1978, is to evaluate the operation of the Act. Enforcement of the Act emphasises conciliation, either through the personal grievance procedure of the industrial relations system, or through the mediation of the Department of Labour's Factory Inspectorate. Cases may be taken by the union or the inspector to the Industrial Court. An individual may seek leave of the court to take the case independently, if she feels her union is not handling it satisfactorily. The Industrial Court may require the payment of back pay, and impose a penalty for non-compliance with the Act, or refusal to comply, of $400 for a person, and $1,000 for a corporate body. To date no case has been taken to court as most are settled by conciliation. Some trade unions have found that individual women are reluctant to complain about their pay and/or are reluctant for a case to be taken on their behalf.

The United States Equal Pay Act (1963) prohibits different rates of pay for substantially the same work; it makes collective agreements with separate wage structures illegal. It does however permit pay differentials based on seniority, productivity or 'any factor other than sex'. In 1972 its coverage was extended to executive, administrative, professional and outside sales employees. Enforcement is in the hands of the Department of Labour, which has power to investigate possible violations, negotiate settlements and if necessary take employers to court. The complainant's name can be kept confidential, as a safeguard against retaliation. The Department can investigate on its own initiative, and when acting on an

individual complaint it usually investigates a major portion of the enterprise, thus widening the scope of action taken. If conciliation is unsuccessful, it can seek an injunction against further violations and sue for back pay for the workers concerned: two years back pay for a non-wilful violation of the law, three years for a wilful violation. Fines or imprisonment can be, but have never been imposed. Complainants can also take the case to court themselves if unsatisfied with the Department's actions. The working of the Act has produced some well-publicised successes, and the complaint procedure has worked quite rapidly and efficiently. A weakness of the Act, however, has been the difficulty of comparing women and men in different jobs. There is no provision in the law for job evaluation, partly due to long-standing suspicion on the part of workers. The issue of job segregation is outside the scope of the law, and the Department of Labour generally avoids comparing apparently different jobs thus leaving a loophole for the unco-operative employer. However, different job titles are not permitted to conceal the same work, and mental and physical effort may be taken into account in comparing jobs.

The Equal Pay Act (1970) in the United Kingdom, on the other hand, requires equal pay for 'work rated as equivalent' under a job evaluation scheme, in terms of effort, skill, decision etc., for men and women working for the same employer or an associated employer. Differentials are permitted if paid on the same basis to women and men. The phase-in period of the law (1970-75) concentrated on the elimination of discriminatory collective agreements. Disputes arising now concerning collective agreements can be referred to the Central Arbitration Committee. Individual complaints, on the other hand, are the province of industrial tribunals, independent bodies consisting of a legally qualified chairman appointed by the government and two lay members with knowledge of employment in industry or commerce. A conciliation officer, appointed by the Advisory, Conciliation and Arbitration Service, will first try to resolve the dispute If necessary, the case is then heard by the tribunal, whose procedure is informal. The complainant may present the case personally, but in practice about half are represented by their unions, and some retain a lawyer. The informality of the proceedings is an advantage. They form a logical extension of the conciliation stage. The personal participation of the complainant shows a contrast with the United States system, where confidentiality is considered necessary to protect the complainant.

In France, two recent legal decisions have established important principles concerning the operation of the equal pay law. The.

first (1) found in favour of women workers performing different jobs to men on the grounds that their work was of equal value with that of the men. The second (2) questioned the conception of women's earnings as secondary, emphasising parental status rather than that of the father alone as 'head of the family'. Both these decisions concern pay in the widest sense, including not only wages but also bonuses and fringe benefits. It is noteworthy that they are of general, not merely individual, application.

The enforcement of equal pay laws has encountered difficulties in various Member countries. In both Canada and the United States, for example, the drafting of the laws, in terms too restrictive or terms too vague, has created problems, for it is clear that some employers will go no further than they have to. A general weakness of equal pay laws is that employers have a financial incentive to delay compliance with the law, and as the penalties concern only the payment of arrears of earnings, there is no real loss. It is necessary therefore to make the law as comprehensive as possible in defining how 'equal work' is to be determined, and not limiting the comparison of male and female workers to one establishment. Otherwise, it is too simple to circumvent the law by making minor alterations in job content or keeping male and female workers separate in different locations. Minimum pay laws can reduce the earnings differential between workers in different occupations, and thus attenuate one of the bad effects of occupational segregation, though without providing a solution to the problem. Occupational segregation is, of course, not dealt with by equal pay legislation. To be effective, action on equal pay must form part of a wider strategy of employment equality.

This wider strategy is reflected in many national laws which, however, vary greatly in their theoretical and practical approaches. Austria views the question of employment opportunity from the general standpoint of the rights of citizens and the rights of spouses, broadly interpreted. Besides the fact that the Constitution (art. 7 B-VG 1919) declares the principle of quality for all citizens of both sexes, the legislation on the personal effects of marriage which was enacted on 1 July 1975 (effective date 1 January, 1976) changed the old principle that the man was sole head of the family. Husband and wife are now jointly responsible for the support and care of each other and of their children. Together they determine

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(1) Decision of 22 June 1977, Chambre Sociale, Cour de Cassation.

(2) Decision of 17 March 1978, Tribunal des Prud'hommes de Paris (affaire Diébolt).

who will provide the necessary financial means and who will take care of the household. Whatever they decide has to be in the best interest of their children. They are equal before the law in all matters regarding their domestic relations. Therefore the wife is no longer bound to follow her husband to a new place of residence if she can claim valid reasons for not wishing to do so. The wife cannot be prevented from pursuing her own career; nor can she be forced to work outside the home unless her husband's earning capacity is impaired. Should both spouses work, they are both bound to share in the household activities. The concept of partnership as embodied in the law will have, and in some court decisions already has had, a positive influence on equal employment opportunity for women. Working groups have already started applying the new family law to social and labour legislation. Furthermore, the Federal Ministry of Social Affairs plans a law concerning equal treatment in occupations and professions, which will include adequate enforcement machinery. A draft bill concerning the secured and continued payment of wages, salaries and other benefits, which includes a section prohibiting sex discrimination in payment, has already been submitted to experts.

The Japanese Labour Standards Law, while including definite provisions concerning equal pay, does not clearly prohibit sex discrimination in other aspects of employment. An increasing number of cases have been taken before the courts in an attempt to have discriminatory practices abolished. Similarly in Germany, as far as legal redress is concerned, the onus lies on the individual to pursue a civil action.

A different approach is to create a system by which a public authority is charged with primary responsibility for applying equality laws, both to assist individual complainants or organisations, and where necessary to take the initiative in investigating a possible breach of the law, and resolving it by means of conciliation, arbitration or, if necessary, legal action. Several Member countries have adopted or are adopting measures of this kind. Notable among them are the United States and the United Kingdom, whose experience will be examined in some detail here. Mention will also be made of the positive measures taken in Canada and Sweden.

The United States approach to equal opportunity in employment is mandated by a host of Federal enactments - statutes, judicial decisions interpreting the Constitution, and executive orders and regulations. Taken together, they constitute a comprehensive ban on job discrimination, covering all Federal, State and local jobs and nearly all private employment There are two complementary approaches: prohibition of discrimination by unions and employers, and the requirement that Federal contractors and those engaged in

federally assisted construction projects take affirmative action to remedy the effects of past discrimination.

Prohibition of discrimination is embodied in Title VII of the Civil Rights Act (1964), and strengthened by the Equal Opportunity Employment Act (1972). It is illegal for an employer to refuse to hire or to discharge any person, or otherwise to discriminate in any of the conditions of employment because of sex, race, religion or national origin. An exception is when sex is a bona fide qualification. The Equal Employment Opportunity Commission (EEOC), composed of five commissioners appointed by the President, administers Title VII. It receives and investigates complaints filed by an employee or group of employees, job applicants and organisations. It may also initiate charges. Title VII provides for the EEOC to defer cases to State and local fair employment practices (FEP) agencies, which have the authority to grant or seek relief from discrimination prohibited by the Civil Rights Act, as amended, for a period of sixty days. If no action occurs at the State or local level, the case reverts to EEOC. When EEOC finds reasonable cause that a discrimination charge is justified, attempts are made, through conciliation, to reach an agreement eliminating all aspects of the discrimination revealed by the investigation. If conciliation fails, EEOC has the power to go directly to court to enforce the law, as does the individual.

Title VII has evolved through three stages since 1964: (i) emphasis on employers' intent to discriminate; (ii) emphasis on equal treatment of all protected classes; and (iii) focus on disparate impact of employer policies and practices on particular groups. The third stage shifts from motive or blame to the recognition that policies and practices which are apparently neutral are discriminatory when they have an adverse effect on particular groups.

Affirmative action to achieve equal employment opportunity is embodied primarily in Executive Order 11246 (issued 1965, amended 1967), the latest in a long line of anti-discrimination measures acting through the Federal Government's contracting power. A significantly large proportion of industrial employers are government contractors, and so the Executive Order is viewed as a powerful instrument for change. It is recognised that many discriminatory practices of the past remain so deeply embedded in basic institutions of society that these practices continue to have unequal effect on certain groups in the population, even when the employer has no conscious intent to discriminate. It is felt that if the employer evaluates his own practices and develops his own remedies, discriminatory practices will eventually be eliminated and occupational segregation reduced.

The contract between the Government and business enterprises advises the contractor of the obligations that must be met to provide equal employment opportunity (EEO) if Federal monies are to be used. The contract provisions allow for voluntary compliance with the contractual obligations, but when voluntary compliance is not obtained, then sanctions can be imposed, including cancellation of contracts, debarment of contractors from future Federal contracts, and public identification of noncomplying contractors. Two steps are required: review and analysis of employment practices to identify unintentional barriers to the hiring and promotion of women which result in their under utilisation by occupational category and development of an Affirmative Action Plan with goals and timetables to overcome under-employment of certain groups. The Office of Federal Contract Compliance Programmes (OFCCP) has set out detailed guidelines for use in preparing affirmative action plans.

The measure of a voluntary Affirmative Action Plan is its results. To ensure that positive results are achieved, employers are expected to analyse their present workforce to identify jobs, departments or units where women are underutilised (underutilisation has been defined as having fewer minorities or women in a particular job group than could be reasonably expected by their availability in the labour market area); set specific goals which are attainable through good faith efforts and are accompanied by target dates; review and revise, as appropriate, all employment procedures to ensure they are not discriminatory in impact; and take any other steps needed to show measurable yearly improvement in hiring, training, and promotion of women in all parts of the organisation. Whenever a review of a contractor's operation shows possible deficiencies in the implementation of the Affirmative Action Plan, the Government begins a process of conciliation to get the problems corrected. This allows the contractor to correct voluntarily the deficiencies noted by the Federal agency before formal debarment procedures are instituted. Every attempt is made to resolve problems without taking formal action. Responsibility for the development and implementation of the regulation executing the Executive Order rests with the Secretary of Labour and the administrative unit in his department, the Office of Federal Contract Compliance Programmes.

The major strength of the United States approach is that it has forced very many employers to evaluate their personnel policies and given them an incentive to develop their own plans to correct the effects of discrimination. Most United States employers now make a serious effort to include women among the candidates for vacant positions, and an increasing proportion of women are now employed in occupations which, ten years ago, were reserved almost

exclusively for men. The progress obviously varies among industries. While many more occupations are now open to women, the United States approach has as yet resulted in only a modest reduction in discrimination.

As many companies fall within the scope of the Executive Order, the Civil Rights Act and the Equal Pay Act, action may be taken by several agencies at the same time; this may include legal action. The complainant may also go to court individually if not satisfied with action taken by the government. In the past, co-ordination among investigating agencies has been unsatisfactory. This has meant confusion and ineffective enforcement for employees and regulatory duplication and needless expense for employers. As a result, an Equal Employment Opportunity Reorganisation Plan has been undertaken. It is felt that this lays the foundation for a coherent Federal structure to combat job discrimination in all its forms.

Another weakness has been the long delay experienced in the processing of complaints. A new Rapid Charge Processing System is being tested. This concentrates on the settlement of complaints through meeting with complainant and respondent. It also makes possible the elimination where necessary of cases lacking in merit. At the same time, emergency relief can be sought for complainants entitled to it, for example by a temporary restraining order. This process keeps many cases out of court - about half are settled by negotiation - and prevents the forming of a backlog: most cases are resolved within a few months. It is also hoped to speed up and simplify the procedure concerned with Federal contract compliance.

The United Kingdom approach is contained in the Sex Discrimination Act (1975), the principal features of which have been outlined above (1). In framing its proposals for enforcing the Act, the government aimed to avert two major problems. It did not wish enforcement to depend too heavily on individual initiative in presenting and pursuing complaints, as the impact of the law would be uneven. Neither did it wish to entrust to a public body an exclusive right to bring proceedings, as the need to investigate every individual complaint, attempt conciliation and if necessary prosecute would be onerous, expensive and time-consuming. The Government proposed, therefore, to combine the right of individual access to legal redress with the strategic functions of an Equal Opportunities Commission which would identify and deal with discriminatory practices by industries, firms and institutions and would be empowered to issue 'non-discrimination notices' enforceable through the courts.

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(1) See page 86.

Under the Act, individuals who believe they have experienced discrimination in employment on grounds of sex or marital status may make an application to have the case determined by an industrial tribunal which also deals with complaints arising under other labour legislation. In addition, in sex discrimination cases, in order to help a person to decide whether discrimination may have occurred, there is a procedure whereby she or he may question the respondent, for example an employer, in writing and the questions and responses may be admissible as evidence in tribunal proceedings.

The subsequent stages of enforcement are similar to those for the Equal Pay Act, namely, conciliation by the Advisory, Conciliation and Arbitration Service prior to a hearing before an industrial tribunal. If the tribunal finds in favour of the complainant, it may issue an order declaring the rights of the parties to dispute, or recommend that the employer take specific steps to eliminate the effects of the discrimination within a specified time. The tribunal may also require the employer to pay compensation to the complainant. Compensation may include loss of earnings and, if it can be demonstrated, prospective loss of earnings or injured feelings. The maximum amount of compensation that can be awarded is currently £5,200.

The Equal Opportunities Commission, which formally reports to the Secretary of State for the Home Office, has the statutory duties of working towards the elimination of discrimination, of promoting equality of opportunity between men and women generally, and of monitoring the Sex Discrimination Act and the Equal Pay Act including, if necessary, making recommendation for amendments. As well as its strategic functions in enforcing general aspects of the law (for example, in discriminatory advertising) it can assist an individual complainant where the case raises a question of principle or where it would be unreasonable to expect the complainant to proceed unaided. Under these circumstances, the Commission may provide advice or actually represent the complainant, for example, at industrial tribunal proceedings. The Commission has up to now been cautious in exercising its authority. Its major role has been to persuade employers to comply with the law voluntarily. It has therefore attempted to educate employers and other groups concerning the purposes of the Act, and has issued guidelines suggesting practices to be followed by employers, for example in job advertising.

The Sex Discrimination Act does not require employers to take positive steps to reduce discrimination along the lines of those carried out in the United States by the use of Federal contracting power. Employers do not have to analyse their staffing patterns and develop a plan for increasing participation of women or men in

jobs in which they are under-represented. The Act does however permit training bodies, employers, trade unions, professional organisations etc. to increase the participation of women or men in a particular field by encouraging qualified applicants of one sex by means of special training opportunities or other forms of encouragement. It does not permit discrimination between candidates when making a selection. In elected bodies forming part of such organisations (executive councils, committees, conferences etc.), a greater balance between the sexes may be ensured by reserving or creating by co-option a number of seats for men or women.

It cannot yet be said with certainty how effective this approach, which relies so much on voluntary change by employers, will prove over time, especially when the employment situation picks up. There is evidence that employers are aware that some of their traditional hiring practices will have to change. Many individual cases can be cited in which the traditional barriers of sex segregation have been overcome. Job advertising has changed, and it is reported that many employers now interview women for posts not open to them in the past. The extent of these changes throughout the labour market is more doubtful. Few organisations appear to have made any systematic analysis of their staffing patterns or to have taken positive action in recruitment or training in the ways permitted by law. Acceptable progress in the future may require firmer action by the Equal Opportunities Commission.

Canada's efforts to end occupational segregation and the discrimination which is a major cause of it, have their basis in the Human Rights Act which in 1978 provided enabling legislation for affirmative action programmes. While affirmative action will be initially a low impact programme, the Canada Employment and Immigration Commission, the Human Rights Commission and possibly Labour Canada will develop regulations and guidelines for employers who adopt affirmative action plans and will work closely with provinces for consistency in a federal/provincial approach to affirmative action. The Human Rights Commission is authorised to instruct an employer to take affirmative action on behalf of a group. Seven out of ten provinces have affirmative action included in provincial human rights legislation.

In Sweden, a Report of the Committee on Equality between Men and Women has proposed among other measures, legal demands on employers to pursue 'active work on behalf of equality'. The proposals go further than measures demanded or permitted by legislation in the United States or the United Kingdom. In the latter country, it is not permitted to choose between equally qualified applicants for jobs so as to increase the participation of women or men, though

applicants of a particular sex can be encouraged by recruitment campaigns or special training, for example. The Swedish Committee's proposals would oblige employers not only to seek to recruit persons of the under-represented sex, but also to give priority in the case of equivalent qualifications to the under-represented sex. This would, if necessary, be enforced by an injunction of the Labour Court. However, the primary responsibility for administering the law would rest with trade unions and employers, who would to some extent decide for themselves on the application of the employer's obligation to work actively on behalf of equality. The long-term goal is that in general the workplace should maintain an even distribution between men and women within every type of job and within every category of employee (1).

TOWARDS AN EFFECTIVE EQUALITY PROGRAMME

As in any radical change in economic and social customs in which governments are called upon to play a part, an important element in their policy is to channel and take advantage of already existing currents of opinion and activities within the community. Education of opinion, the diffusion of information concerning the rights and developing opportunities of citizens, the co-ordination of action between groups in the community and its own agencies, the formulation of guidelines and programmes for continuing progress - the activities that have in this chapter been generally termed 'education, monitoring and moral suasion' - are all necessary. The governments of some Member countries have been in the fortunate position of achieving considerable progress towards sex equality in the labour market without needing to introduce measures of intervention, or else only having to provide a 'safety net' to make sure that no groups or individuals were left behind the general advance carried out principally through collective bargaining.

Other coutries have not been able to rely to the same extent on voluntary action by employers or trade unions, either because collective bargaining has not been sufficiently centralised and has not covered enough of the work force, or because employers and unions have not been in the vanguard of progress in this matter. Economic arguments have been brought out by employers to justify delay, there has been reluctance to change on the part of some workers. In these

(1) Proposal for a Law on Equality between Men and Women in Working Life, Committee on Equality, Stockholm, 1978, page 11

circumstances, the use of legal measures on a substantial scale has been necessary. This reluctance to change, which the laws have been specifically called upon to overcome, has been strong enough and widespread enough to cause important problems in their application.

Although for the purpose of analysis and presentation, voluntary action and legal compulsion have been put forward as if lying at opposite ends of a policy spectrum, in reality of course they are not mutually exclusive. Nor should they be. Each kind of policy has its own particular difficulties: collective bargaining depends for its effectiveness on the existence of strong organisations and of already changing attitudes; legal action, tied to its formulae and procedures, may prove time consuming and open to avoidance. Thus there is occurring a convergence, in that countries are adopting several complementary approaches, encouraging employers and workers, by law, regulation and/or guidelines for collective agreements, to formulate their own programmes for positive action aiming at sex-equality. It is in the light of this need to develop a comprehensive strategy suitable for different national conditions, that the following comments on policy orientations are offered.

COLLECTIVE BARGAINING offers important advantages as a component of an equality programme. It enables changes to be brought about fairly rapidly, and, in the case of national agreements, covers a very wide field, rather than being linked to individuals or small numbers of employees of a particular enterprise. It has its own rapid and effective enforcement machinery, it is harder to circumvent and can be monitored constantly by the parties. It can be regularly updated. It encourages the participation of workers and their representatives and therefore is itself a means of changing attitudes. It can combat inequality of earnings due to occupational segregation.

This ideal cannot always be realised. It may require strong central organisations on both sides, employers as well as unions, carrying out centralised bargaining or giving central direction to bargaining. It requires a high degree of unionisation among women workers, with their interests being given weight at decision-making levels, preferably through the participation of women in union leadership. It requires too that men should manifest social solidarity. These conditions cannot be taken for granted in all OECD countries. Many women are not unionised. Even in traditionally 'female' occupations workers 'organisations may be dominated by men. There have been cases of resistance by male workers - to the lessening of differentials, to the ending of privileges (for example with regard to apprenticeships), and even to change in traditional views of sex roles.

In many countries, therefore, action needs to be taken on these matters in order to increase the effectiveness of collective bargaining as a means of achieving equality. In New Zealand, for example, where very few union positions are held by women, who do not play a full role in the movement, the New Zealand Committee on Women is taking steps to encourage them to be more active in unions. An educational campaign is to be carried out, in co-operation with the public and private sector and trade union interests, directed at school pupils and women workers. In the United States, unions come under the equal opportunity laws, and some have introduced affirmative action plans to increase the representation of women. In the United Kingdom, the law permits special action to reserve places for women on union committees and similar bodies.

Collective bargaining can be, in short, an effective and rapid method of achieving greater equality, when national conditions are suitable. Otherwise, it needs to be supplemented by a degree of outside government intervention, and even legal regulation. This may prove particularly to be the case in a period of economic recession, which places additional barriers in the way of progress towards pay and employment equality.

Any country that could limit the extent of its intervention to the kind of actions described above under the heading of EDUCATION, MONITORING AND MORAL SUASION, would be fortunate indeed. Of course, in reality this can only be one aspect of a much broader strategy, and yet it is one that is always needed. Those countries that have used special permanent bodies representing government, the social partners and women's organisations, seem to have found them of considerable benefit. The special advantages of a body of this type are its ability to act as a source of ideas, a co-ordinator and an educator.

THE USE OF THE LAW is taking an increasing importance as many Member countries are adopting or have adopted equality laws in response to international instruments, to supplement collective bargaining and to give redress and protection to those in a weak position in the labour market due to their marginality or lack of organisation. Legal procedures carry with them certain problems. For example, the need to be precise in their formulations and the obligations they impose mean that their effects may be too narrow: employers have tried to circumvent the law by changing job titles, modifying slightly the content, or breaking down the wages into basic rates, bonuses, allowances, etc. While careful drafting with full consideration of the implications can reduce the problem, it has been necessary, especially with regard to equality laws, to develop new concepts in order to encourage employers to go further

than a narrow adherence to minimum obligations. A second problem of legal methods in certain countries has been the time needed to follow the strict procedures that justice demands.

As regards equal pay, the question of concepts is simpler than that posed by employment equality, but it has nevertheless caused difficulties. It has proved necessary to define equal pay as including all emoluments, and to define 'work of equal value' in such a way as to permit reasonably wide comparisons to be drawn with men who are likely to be doing somewhat different jobs. There is no complete consensus as to the solution. Job evaluation schemes for judging 'work of equal value' would seem to be a systematic method, in spite of practical problems. Where it is not considered possible to use these, reliance has to be placed on the emergence (for example through legal precedent) of some workable means of deciding what constitutes 'broadly similar work'.

In taking a step beyond the question of equal pay, to that of prohibiting employment discrimination, there are problems that have still to be resolved. In some countries, even such precise matters as discriminatory advertising or pension provisions have not been dealt with, and much more remains to be done in such matters as equal access and promotion, which are harder to specify precisely. It has been suggested that the problem of providing discrimination could be solved by accepting 'probability' as sufficient.

An important evolution in the concept of discrimination has been the movement away from intent to discriminate on the part of the employer as the target of the law, to concentration on the impact of employment policies, irrespective of the employer's intentions. This is a more flexible concept, and makes it possible to demand more positive action to alter the pattern of employment and promotion within an employing organisation, rather than merely desisting from discrimination.

The principle upon which procedures are generally based is that it is necessary to give redress to the individual - which is, as was suggested above, an important part of the raison d'être of the legal approach - but without relying too heavily on individual initiative. This is necessary both for the sake of the individual who does take action, for the cost in time, effort and perhaps money may be great, and also for the sake of all those who feel too vulnerable to take steps themselves or who may be unaware of their rights. Laws providing for equal treatment for all citizens, but without establishing enforcement machinery, cannot be an effective instrument. They must rely on voluntary compliance or action through collective bargaining.

In Ireland the Employment Equality Act, 1977, makes it unlawful to discriminate on grounds of sex or marital status in regard to recruitment for employment, working conditions, in access to training and promotional opportunities. While the Act is aimed primarily at discrimination by employers, it also prohibits discrimination in activities which are related to employment, such as discrimination by organisations concerned with the provision of training courses as well as placement and guidance services provided by employment agencies. Admission to membership and the benefits provided by trade unions and employer organisations is also covered by the Act since such membership can affect eligibility and prospects for employment. The Act also prohibits the display or publication of discriminatory advertisements. It is an offence also under the Act to dismiss a person solely or mainly for the reason that he or she pursued a case to secure equal treatment under the Act. The Act gives a person who feels that he or she has been so discriminated against the right to take their case to the Labour Court. The Court may, if discrimination is proved, recommend a specific course of action to comply with the law, award compensation and in the case of dismissal may order re-instatement or re-engagement of the aggrieved party. The Employment Equality Act, 1977, provided for the establishment of an Employment Equality Agency. The Agency which came into operation on 1st October, 1977, is a statutory body composed of a chairman and ten ordinary members including representatives of workers, employers and womens organisations. The main functions in general terms of the Agency are, in the public interest, to work towards the elimination of discrimination in employment; promote equality of opportunity in employment between men and women; and keep under review the working of the Anti-Discrimination (Pay) Act, 1974, and the Employment Equality Act, (1977), and where necessary to make proposals for amending either or both of those Acts. The Agency also has certain enforcement functions in the public interest. It may conduct formal investigations and if satisfied that there are practices or conduct in contravention of the equal pay legislation or the Employment Equality Act, 1977, it can issue non-discrimination notices requiring that they cease. The Agency is empowered to seek a High Court injunction in respect of persistent discrimination. Moreover, the Agency has the sole right to initiate proceedings in cases of discriminatory advertisements, pressure on persons to discriminate and where there is a general policy of discriminatory practices.

While the filing of a large number of complaints might be regarded as a measure of success, a very serious problem of delay has resulted, especially in the United States. Experience has shown the need for:

- preliminary screening to eliminate cases not requiring to be pursued;

- fact-finding and conciliation sessions to reach the fastest possible settlement in the interest of both parties; while there is disagreement as to whether the complainant should participate directly, experience in the United Kingdom suggests that his or her presence is valuable and should be considered where possible;

- the reduction of the number of agencies operating simultaneously (or at least maximum co-ordination between them) so as to reduce delay and unreasonable expense;

- informality in proceedings, to encourage conciliation and to avoid placing a complainant at a possible disadvantage.

It is necessary to provide complainants with maximum protection against retaliation. The best guarantee, of course, is when employees take collective action, for it seems that the individual worker will usually hesitate to act alone, and can never be afforded absolute protection.

If progress is to be speeded, action is needed on a wider basis than that of individual complaints, and employers must be encouraged to take action themselves. The threat of sanctions alone is unlikely to give satisfactory results, as they will generally be confined to back pay and/or minor damages; in this case, there is little to lose in delaying, especially in equal pay. Heavier sanctions are difficult to apply: many countries have purely theoretical provision for the imprisonment of violators; in the United States the authorities could in theory close whole school systems if they discriminated. As such measures are scarcely practicable, it is necessary to find other means of securing co-operation. In the United States, the use of Federal contracts has proved a powerful incentive. To win contracts, employers need to bring their employment practices up to standard, and in some cases recalcitrant employers have been disbarred from receiving contracts. In other countries, where public sector employment may be large, governments have a direct means of acting on employment practices in many fields. Where public opinion is sufficiently aware of the issue of discrimination, publicity can also prove a useful instrument, due to the favourable or unfavourable effect it can produce on potential customers and potential employees.

The government can also influence the attitude of employers through an educational campaign. Governments may wish to enlarge this approach by providing consultant services. Experience in some countries has shown that if employers realise they are violating public policy, they are usually afraid to go to the appropriate administrative body and explain their problem. If an employer admits that he may be in violation of the law, he runs the risk of prosecution.

A more flexible approach might be that in the case of first offenders less severe penalties or no penalties will be applied if the employer independently asks the government for use of its consultant services. Of course, this presupposes that there is a system of penalties which is applied to violations.

To sum up, there is no ideal method or universally applicable programme for achieving complete equality in the field of pay and employment. Each approach has its limitations, which vary in degree according to national circumstance. However, the strength of one policy option can complement the weakness of another, and it is for this reason that countries are now adopting more comprehensive approaches. Though tailored to their own needs, the programmes of each country therefore are increasing in similarity. So are the aims of their policies, for it is being realised that positive measures to achieve equality must be pushed further, with the aid of collective bargaining, education and legislation, and supplemented, as described in the chapters that follow, by measures to help parents to benefit from their rights. The differences between countries in the future may be less a matter of technical differences in their policies than of political will in carrying them out.

IV

TIME ARRANGEMENTS

MULTIPLE ROLES AND RESPONSIBILITIES

At a time when greater attention is being paid to the effects of time arrangements on the quality of life and the humanisation of working conditions, it has been thought useful to include in the present report a chapter on the advantages and disadvantages of certain measures in this field, from the point of view of equality of the sexes in economic, family and social life. The more general advantages of greater flexibility in the arrangement of work and leisure time for the enrichment of individual, family and community life will not be emphasized although they form a background to the discussion of the specific issues treated here.

Time flexibility is one element in a general strategy towards equality. Properly used, it can help individual workers to find solutions to the problems arising from the accumulation of employment and family responsibilities. In the longer term, the extension of flexibility in work schedules can provide the opportunity for, though of itself it cannot guarantee, a fuller sharing of family roles between parents. For this reason, the need to make available to both men and women the various arrangements outlined below, and to encourage their use by both, cannot be over-emphasized.

The benefits for the family of flexibility in working schedules are evident. The benefits to the careers of employed parents are no less important. For example, discontinuity of employment in the case of workers who need to take time off to rear children could be reduced by fixing work schedules to take account of individual needs as well as providing adequate pre-school and school age child-care facilities. This would be one step towards reducing some of the male-female earnings differential, due both to prejudice and to differences in seniority and experience. Moreover the possibility of choosing between employment opportunities, rather than being forced by circumstances into a particular job, would be enhanced.

Time flexibility can not of itself guarantee greater equality in economic or social life. When it was promoted in the 1960s, shortages of manpower and the needs of employers to expand employment

provided powerful motivation. In a period of stable or slowly growing employment, the desire in some quarters to reduce hours of work combined with constraints in the availability of employment particularly for those on the margins of the labour market can mean that the choice of working hours has little to do with the individual needs or interests of workers or their families. In particular the increasing number of women in part-time employment in many Member countries may not have sought it voluntarily. Nevertheless, in a better employment situation in which real choice was available, time flexibility could offer a measure of freedom to the individual throughout his or her working life, permitting the alternation between employment, training, study, care of the family and leisure, without requiring a complete break with employment. In isolation, a policy of encouraging time flexibility might merely permit the continuation of the present unsatisfactory position of many women workers by making it somewhat easier for them to carry the double burden of employment and family care, and thus counteract efforts to change conventional sex roles. But as one element in a strategy for equality in economic and social life, along with the increased provision of child care and all the measures for integrating women more fully into the labour market, time flexibility for both men and women can help promote a fairer sharing of roles for which the changing attitudes of both sexes are the best guarantee.

At present, rigid systems of working hours (daily, weekly, monthly and yearly) pose great problems for the increasing number of families with two working parents and for single-parent families. Since child-care facilities are insufficient, the whole family suffers. Within the family, as child care is still usually considered mainly the responsibility of women, it is usually their employment that suffers most. Moreover, shortage of spare time makes it more difficult for workers with family responsibilities to add to their education and skills and consequently to advance their careers.

Although as stated in an OECD publication on the recession (1), "Women are more likely to be out of work than men and their labour force behaviour seems to be more sensitive to changes in economic conditions", there is no evidence that women will withdraw from the labour force in large numbers as a result. It appears on the contrary that a growing number of female workers are inclined to take up or to continue employment in a period of recession. As shown in Chapter I, the highest rate of labour force participation tends increasingly to coincide with the years of greatest fertility.

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(1) The 1974-75 Recession and the Employment of Women, OECD, Paris, 1976, page 7

It can therefore be assumed that whatever the economic situation, and however inadequate the measures to help them might be, persons with children and other family responsibilities will continue to take gainful employment. Modification of some of the features of present-day patterns of work are therefore desirable to raise the quality of family life, particularly by enabling parents to spend more time with their children and thus ensure the best conditions for the development of pre-school and school-age children. The purely economic benefits, such as reduced absenteeism and greater stability of employment are also worthy of consideration.

PATTERNS OF WORKING TIME

The various types of time arrangement, as reviewed below, have different consequences for workers, families and children, and, in some cases, for the labour market.

The relatively recent introduction into European countries (1) of the UNBROKEN WORKING DAY without the traditional two-hour lunch break, has upset certain family habits, as the parents no longer come home for lunch. From commerce and industry, the unbroken working day has spread to the educational system, and schools as well as firms have had to organise canteens. The main advantages for working parents besides saving time previously spent in coming and going between noon and 2 p.m., are that they are freed from the need to prepare a midday meal and so are able to work further away from home, and that members of the family have more time together at the end of the day's work. This working pattern may be less appropriate or necessary in smaller countries or rural areas where distances between home and work may be shorter and canteen facilities for children less frequently available. In France, for example, 40.5 per cent of workers in the provinces are opposed to the unbroken day compared with 27 per cent in the Paris area (2).

THE FLEXIBLE HOURS SYSTEM enables parents to synchronise their dpearture and arrival times more effectively with those of their children, particularly when the parents are able to leave and return earlier by adjusting their hours of work accordingly. Sometimes, very little rearrangement is required. For example, in one French city, local government employees were allowed to leave a quarter of an hour earlier, while the school day was lengthened by a quarter of an hour. This half hour's dephasing was calculated to reduce the

(1) This probably does not apply to North America or Australia, where the lunch break has always been very short. Due probably to distance from home, the unbroken working and school day is long established.

(2) "Entreprise et Personnel: les femmes et le temps de travail", page 4, Nov. 1977

peak-hour demand for transport, but it had another consequence for the children: they often found their parents at home when they returned from school. This flexible hours system, with its mobile periods at the beginning and at the end of the working day, offers parents a choice and reduces problems concerning child care and school services posed by rigid work schedules. Moreover, it permits parents to work shorter time one day if necessary (in case of child sickness, for example, or for taking administrative steps with services only open during normal working time) and compensate by working longer another day. However, careful planning is necessary. In large cities, for example, travelling outside peak hours may be more scattered and waiting time for transport increased. Also, if maximum benefit is to be derived from flexible hours, there must be co-ordination of the hours of shops and other services with working schedules.

The core time of flexible working hours, when all workers must be present, may vary. It may, for example, extend from 8.15 a.m. to 12.30 p.m. and from 1.30 p.m. to 4.30 p.m. in which case the flexible bands are rather short, from 7.45 a.m. to 8.15 a.m. and from 4.30 p.m. to 5.30 p.m. If lunch is included in the core time, the flexible bands may be longer, for example from 8.00 a.m. to 10.00 a.m. and from 4.00 p.m. to 6.00 p.m. If the system includes a variable lunch break, the flexible bands may be further extended. Such variations are particularly valuable for families in which both parents work, for by synchronising their time they can arrange the presence of an adult at home. One parent, for example, might go to work at 7.30 a.m., take a short lunch-break and return home at 4.00 p.m. to take care of the children. The other parent might begin work later in the morning, so as to be able to take the children to school or day care, and finish later in the afternoon. Such arrangements could also be made between neighbours.

Flexible time has been successfully introduced in a number of countries of western Europe, Canada and the United States and has proved very popular, but its application, because of inherent limitations relating to the size and structure of firms and the nature of particular jobs, is so far mainly restricted to office work and, in general, to the service sector. In both Switzerland and Germany, the system has been made available to well over a million workers, in France to about 700,000, the United States 150,000 and the United Kingdom 100,000.

In several countries, long-term experiments have been conducted in public administration and in certain industrial sectors. In Canada, for example, the Federal public service insituted a system of flexible working hours in certain departments in 1974. Core times are 9.30 a.m. to 3.30 p.m. with a seven and a half hour working day. Detailed comparative data would make it possible to

devise the most suitable timetables and find new schemes to better harmonize the activities of the secondary and tertiary sectors to reduce transportation congestion at peak hours. Attention must also be given to the possible repercussions of flexible hours on total working hours and on overtime earnings.

PART-TIME EMPLOYMENT is defined by the International Labour Office as "regular voluntary employment carried out during working hours distinctly shorter than normal working hours"; it is stable, not temporary, casual or intermittent; it is not the result of adverse economic conditions resulting in cutbacks in working hours; it may be part day, part week or part month. It may be attractive as a form of time arrangement to those with family responsibilities; to students who combine paid work with study; and to elderly people who wish either to retire gradually or take paid employment after retirement to add to an often inadequate income.

In several Member countries, the volume of part-time employment has been increasing substantially. In the United Kingdom, part-time workers formed 15.3 per cent of the labour force in 1973, rising to 16.9 per cent in 1975. In Germany, the proportion of part-time workers rose from 2.6 per cent in 1960 to 8.3 per cent in 1975. In Japan, too, part-time employment has rapidly expanded and there are over two million women working part time, often in unskilled occupations. In France 83 per cent of part-time workers are women. In the United States in 1977 nearly eleven and a half million or 14 per cent of non-agricultural employees worked on voluntary part-time (less than 35 hours) schedules. 69 per cent of these part-time workers were women. Ideally, part-time employment could offer advantages to people who might otherwise leave or be unable to re-enter the labour market for long periods, lose contact with the working environment and have their skills dissipated. However, in a weak labour market, fewer people than previously may be taking part-time employment voluntarily. Such employment frequently entails a lack of job security and less than full social security and pension rights, and is available mainly in routine and poorly paid jobs. Also, transport charges and taxes have to be met that may be disproportionate to a part-time income.

To improve the condition of those engaged in it and to realise the benefits it could offer to certain workers, part-time employment must be provided with the conditions characteristic of full-time employment. This has been done in some countries. In the United Kingdom, for example, part-time workers have been able, since February 1977, to qualify for rights similar to those of full-time workers under certain conditions: they must work 16 hours or more per week for the same employer, or have worked at least eight hours per week for the same employer for five years. Rights involved

include a minimum period of notice (under the Employment Protection Act), protection against unfair dismissal (under the Trade Union Labour Relations Act), paid maternity leave with guaranteed re-employment, time off to look for work or to arrange training if made redundant, payment if suspended on medical grounds and guaranteed payments for workers laid off or on short time (1). In Japan, laws on Labour Standards, the Minimum Wage and Accident Compensation apply to part-time workers, as does unemployment insurance under certain conditions, namely, if regular weekly hours are more than three quarters of those of full-time workers, or more than 22 hours. In Austria there are generally no differences between part-time and full-time work as regards legal status, social security and pension rights. In some branches, however, full rights depend on the number of hours worked: in some cases, half the normal working week (i.e. twenty hours) is required, in other cases one-fifth (eight hours). Coverage is not guaranteed in case of insignificant employment. The effects of increased labour costs on the amount of part-time employment offered is not yet clear (2).

In short, the Working Party concludes that the increased availability of part-time employment will not benefit families as long as its predominant features remain its marginality, its vulnerability in times of economic downturn and its inferior pay and benefits. Measures are needed to regularise part-time and part-year work and give it social benefit coverage. Also, if part-time work is to become a genuine element of flexibility in working life, it must be upgraded and barriers to career advancement reduced.

Without the number of hours actually worked being changed, a COMPRESSED WEEK may be worked; it has been reduced from six days to five in many firms and administrations. The four-day week has already been tried, particularly in the United States (3) since 1969, although it has not shown substantial growth there since 1973. A 1977 United States survey revealed a failure rate of 28 per cent (4). In 1976, about 1,270,000 workers in the United States - 2.1 per cent of all full-time non-agricultural wage and salary workers - worked compressed work weeks, a drop from 2.2 per cent in 1975. Unless

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(1) "New Rights for Part-timers", Employment News, Department of Employment, February 1977.

(2) The social security aspect of part-time employment is discussed below, page 166.

(3) See D. Maric, The Arrangement of Working Hours, ILO, 1977

(4) "Alternative Work Schedules", Part 3, "An AMA Survey Report by Stanley D. Nollen and Virginia H. Martin, AMACOM, a division of American Management Associations, New York.

accompanied by a general reduction in working hours, the days worked will necessarily be longer, so as to free three days of the week. The working day may therefore be excessively long and tiring, and from a family point of view, changing the work/leisure ratio may create new problems of synchronisation between working hours and school hours. On the other hand, advantages of the compressed working week cited by employers include increased output, lower production costs, better utilisation of capital equipment, increased morale, and reduced absenteeism, turnover, and tardiness; advantages cited by workers include increased time for family and "leisure" and a reduction in lunch expenses and commuting time. Disadvantages cited include scheduling and communication difficulties, increased workloads for supervisors, increased moonlighting and greater worker fatigue. Working parents have cited such advantages as the ability to spend more time with their children and the availability of an extra day for housework and such disadvantages as the need to locate child-care services for longer hours, in addition to the problem of co-ordinating their work schedules with their children's school schedules. A study of male blue collar workers on four-day workweeks in twelve firms in two States in the United States revealed that almost twice as many four-day workers were actively involved with their children and that over the entire week men on a four-day schedule spent 200 to 300 per cent as much time with their children.

The STAGGERING OF HOLIDAYS is most relevant for those European countries where paid leave and school holidays are long, and the imperatives arising from climatic conditions strong. The problem is still that of harmonizing the timetables of the various economic sectors with that of the educational system. Greater uniformity in school holidays is necessary in certain (particularly federal) countries, unless firms and services also decide to adopt regional timetables similar to those of the schools, as seems to be the case in Germany. From an analysis of the staggering of holidays in six Member countries (1), it appears that in Belgium and France, for example, the dates of the school holidays encourage heads of households to take their leave during two months of the warm season: in Belgium, this applied to 47.5 per cent of all households in 1972.

(1) Documentation note and studies on Staggered holidays, (Belgium, United Kingdom, Italy, the Netherlands, Germany, France). La Documentation française, 4th September, 1972.

Yet 600,000 women, many of them married, were still working during this period. It might be asked in these circumstances how the often different leave dates of husbands and wives can be co-ordinated with school holiday dates. An added complication is that families prefer to spend at least part of their long leave together, whereas parents might prefer to take their shorter leaves at different times so as to look after their children in turn. In Belgium, the National Labour Council, the joint labour-management boards, the employers and the Ministry of Education have together been trying to find acceptable solutions to this problem. In the United Kingdom, despite the staggering of holidays over the year, school timetables still play an important role in the choice of holiday dates. The bodies responsible for working out collective agreements co-operate with the Government to harmonize the needs of the various sections of the public in this respect. The problem is more acute in Italy, where school holidays extend from July to October. Seventy four per cent of Italians did not go away on holiday in 1972. The unions, the Government, tourist and industrial organisations and the education authorities are trying to make further adjustments in school timetables to make them compatible with off-season holidays. In the Netherlands too, school holidays seem to determine the holiday dates of working parents, but, as the closing of entire firms is strictly regulated, there is little chance of making them coincide. Fixed school vacations are regarded as an obstacle to staggered holidays and do not offer much latitude. The Ministry of Education has staggered the six-week summer holiday for primary schools over eight weeks, on a three-region basis. The scheme has recently been extended to secondary schools (1). In Germany, an original solution for the regional rotation of school holidays was devised after the Government had consulted a large number of bodies: parents, teachers' unions, youth and sports associations, private schools, employers' and workers' organisations, the hotel and tourist industry, transport agencies, local communities and even representative of neighbouring countries, together with the ministries concerned with education, employment and transport. Under the new scheme the majority of businesses in a given region are required to bring their annual leave periods into line with the dates of school holidays decided by the respective federal states. These experiments will continue until 1986 (1). In Sweden, the dates of annual leave in industry are likewise to a large extent determined by school holidays: climatic conditions, however, restrict the holiday season.

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(1) Tourism Policy and International Tourism, OECD, Paris, 1977

Table 13

FULL AND PART-TIME WORK - TRAVAIL A TEMPS COMPLET ET A TEMPS PARTIEL

	Germany Allemagne			France France			Italy Italie			The Netherlands Pays-Bas			Belgium Belgique			Luxembourg Luxembourg		
	T	M	F	T	M	F	T	M	F	T	M	F	T	M	F	T	M	F
								%										
Persons with a main occupation, of which	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0	100.0
Personnes ayant un emploi principal dont:																		
Working part time 1973	7.7	1.0	20.0	5.1	1.4	11.2	3.9	2.3	8.5	4.4	1.1	15.5	2.8	0.4	8.2	4.5	(0.9)	13.9
Travaillant à temps partiel 1975	9.0	1.1	22.8	6.6	2.1	14.0	4.6	2.7	9.9	5.6	1.5	18.6	4.1	0.6	11.6	5.0	(0.9)	15.4
Agriculture 1973	0.7	0.3	1.6	1.1	0.3	2.6	1.3	0.7	2.9	0.1	0.1	0.2	0.2	0.1	0.7	1.1	(0.2)	3.6
1975	0.8	0.3	1.8	1.2	0.5	2.3	1.3	0.7	3.2	0.1	0.1	0.3	0.3	0.1	0.8	1.2	(0.3)	3.4
Industry 1973	2.3	0.3	6.0	0.8	0.3	1.4	1.0	0.8	1.4	0.9	0.3	2.9	0.4	0.1	1.0	0.6	(0.3)	1.3
Industrie 1975	2.5	0.4	6.1	0.9	0.5	1.8	1.7	1.4	2.6	1.0	0.4	2.9	0.5	0.1	1.2	0.5	(0.2)	1.4
Services 1973	4.7	0.4	12.4	3.2	0.8	7.2	1.6	0.8	4.2	3.4	0.7	12.4	2.2	0.2	6.5	2.8	(0.4)	9.0
1975	5.7	0.4	14.9	4.5	1.1	9.9	1.6	0.6	4.1	4.5	1.0	15.4	3.3	0.4	9.6	3.3	(0.4)	10.6
Average hours worked during the reference week																		
Nombre moyen d'heures de travail effectuées au cours de la semaine de référence																		
						Hours - Heures												
Full time 1973	44.7	45.5	42.8	46.4	47.8	43.6	42.8	43.4	40.8	43.3	44.5	38.5	44.4	45.1	42.7	45.2	45.3	44.9
A temps complet 1975	43.5	43.9	42.4	44.2	45.5	41.8	42.1	42.9	40.0	41.7	42.9	37.0	43.4	44.1	41.8	43.3	43.3	43.4
Part time 1973	23.3	24.4	23.2	23.5	28.8	22.4	30.2	31.9	28.8	22.6	25.1	22.0	21.9	21.6	21.9	25.0	25.5	24.9
A temps partiel 1975	23.1	24.7	22.9	22.7	26.0	21.8	29.1	29.9	28.5	22.4	25.9	21.5	21.5	21.8	21.5	22.9	(24.1)	22.7

Source: EUROSTAT, Social Indicators for the European Community, 1960-1975, Table II/4
Indicateurs Sociaux pour la Communauté Européenne, 1960-1975, Tableau II/4.

T = Total
M = Male, Hommes
F = Female, Femmes

These examples show clearly that time flexibility calls for certain reforms to ensure greater synchronisation between the different economic sectors. The solutions adopted to meet economic problems and to relieve the pressure on collective amenities, combined with periodic stoppages in production, will result indirectly in the development of less rigid systems which in time will no longer be a constraint, but will offer a wide range of individual and collective options. The effects of these experiments on the quality of life of gainfully employed parents with school-age children have not yet been evaluated. The need to harmonize social policies concerning child-care facilities, flexible working and school hours, and holidays goes hand in hand with the economic need to stagger the use of the expensive holiday facilities in certain regions which are only fully utilised for certain short periods.

THE LIFE-LONG ALTERNATION OF GAINFUL AND NON-GAINFUL ACTIVITY offers advantages to many workers, and may be especially desirable for those who devote themselves to the care of their families over a period of a year or more. Such a solution should imply the guarantee of subsequent employment and assistance by special provision concerning old age and other benefits to ensure the continuity of contributions to social insurance systems. In addition, discontinuity of employment may create difficulties for a return to the labour market: qualifications may be out of date, requiring further training, or the job itself may have disappeared. The institutionalisation of patterns of employment different from the traditional, continuous, typically masculine one, helps workers with family responsibilities to justify their interruptions and to keep the guarantee of re-employment when they return to the labour market. Periods of unpaid leave are no longer the prerogative of mothers alone, for a tendency is growing for couples to decide which of them will interrupt their employment, basing their decision on the importance of their respective jobs, the loss of income involved, the job satisfaction of the one who hesitates most to leave employment, and of course the personal urge to express paternal or maternal feelings by taking care of home and children for a certain time. In the United States, legislation has been proposed to provide re-employment rights for five years for workers with five years seniority who temporarily relinquish employment to pursue education or child care.

Maternity leave as such, that is, a social obligation to protect the health of women, cannot be shortened. However, its length before and after birth can directly or indirectly be harmful to the occupational interests of women. If they occupy a responsible position, they may hesitate to abandon it for the statutory periods. The replacement of the present maternity leave by a longer period

of leave that parents can divide between themselves is therefore receiving attention (1). The sharing of parental leave would prove of benefit for the development of children, for the presence of the father is considered by specialists to be as necessary to their upbringing as that of the mother. It would also tend to lessen the handicaps suffered by women in employment and promotion caused by prejudice against their "well-known" tendency to take leave for maternity, to stop working during the infancy of their children, and to be absent in case of child sickness. These periods of absence would be shared by men.

Another aspect of life-long time flexibility concerns the age of retirement. The possibility of retiring later would help those - mainly married women - who interrupted their employment to make up for their years of absence from the labour market.

Finally, life-long work flexibility would enable men and women to participate in recurrent education, interrupting their employment in order to improve their basic education, bring their qualifications up to date or learn new skills. In the United States, a law was passed in 1978 to extend the mandatory retirement age for employees in the private sector from 65 to 70 and to remove any age limit for most civilian government employees. This again is particularly important for those women whose school education may not have been completed, or whose career discontinuity may demand the acquisition of new skills to permit a return to the labour market.

BENEFITS OF FLEXIBILITY

Increased opportunities for flexible hours and alternating periods of employment, full and part-time work and non-activity can help towards a more effective distribution of economic, social, occupational, family and political roles between the sexes. Flexible hours would be additionally advantageous in enabling members of the family to share family and social obligations, as would freely chosen absences from employment in the form of parental or other leave to which either of the partners may be entitled. Life-long work flexibility would enable workers to participate in recurrent education by shortening their normal working hours or interrupting their employment if necessary.

To the question of whether the economic position of women can be improved by a more flexible and individual organisation of their pattern of living the answer is positive. To perform their economic role fully at all levels and to acquire or maintain qualifications

(1) See below, pages 127-163.

women must then have more flexibile time options, for up to now their "time budget" has been overloaded. Measures for suitable time arrangements must also be applied to men, however, for the object of such changes is not to give women an advantage or to perpetuate existing sex roles but to adjust modes of action to new modes of life by using the time variable with optimum effect.

Flexible time schemes can help to set up patterns of work that take account of the family unit and its domestic commitments. Furthermore, the search for such time arrangements will help to link decisions taken and policies adopted hitherto independently by different authorities. For example, in deciding time schedules employers might consider transport possibilities, the length of journeys and school timetables, while education authorities take into account the problem of employed parents and certain economic and social constraints before taking decisions on school hours and holidays. The state, in seeking to promote economic and administrative efficiency, will promote harmonization and synchronisation between sectoral and regional time arrangements. These concerted efforts to operate flexible time schemes at different levels, periods and places will improve well-being at work, in the community (leisure and transport) and in the family. Women in particular will have wider choice in the arrangement of their lives, adjusting them to suit the needs and wishes of themselves and their families.

The advantages of time flexibility to those with family responsibilities have already been described. But there are also more general advantages. Experiments have shown that employees working flexible hours are more relaxed and less subject to absenteeism. They have greater freedom to organise their own lives and there is less psychological tension to add to occupational stresses. Not having to travel to work during rush hours, they are less subject to strain and fatigue during long journeys and less exposed to the risk of accident.

To ensure that people who avail themselves of flexible time schemes are not handicapped by their periods of absence from work, the various interconnected social policies in this field should be co-ordinated by the labour market authorities. An example of such co-ordination is the organisation of the return to the labour market after a fairly long period of interruption:

- the scale of the trend should be assessed periodically (manpower statistics);
- the vocational guidance and counselling services and the programmes of training and readaptation for reinsertion into the labour market should be adjusted to the needs of the various categories of workers wishing to resume work after an interruption (see Chapter II on education and training).

The achievement of these aims would require such provisions as:

- financial aid for working parents who need to bring their knowledge up to date, learn a new skill or assign certain family responsibilities to others during their training;
- precautions to ensure that older returning workers are not discriminated against, that the principle of equal pay for work of equal value is applied, irrespective of age, and that valuable experience is not discounted or ignored;
- regulation of part-time employment for workers who can devote less than the normal period of time to paid activity.

Part-time work, when it is voluntary, can meet the needs of those workers whose family or other circumstances might otherwise force them to leave the labour market completely, or prevent them from re-entering it after a period of absence (1). However, reservations are frequently expressed concerning the desirability of part-time work, and more information on the subject would be valuable. In any case, it is desirable to improve the status of part-time work, which is now generally unskilled and marginal, and extend to it the rights and guarantees that apply to full-time work. At the present, labour legislation in most countries provides inadequate coverage, even if the part-time work is stable or permanent. The point made in an earlier OECD report (2) remains valid: part-time workers should benefit, with appropriate adaptation, from family, sickness and unemployment allowances, paid holidays, sick leave, superannuation schemes and promotion rights. The range of part-time jobs should be broadened since existing part-time employment is heavily concentrated in low-wage occupations, and the incentives to employers required to accomplish this need to be identified. New schemes for job sharing and job pairing should be given careful consideration, though their practical difficulties are not to be underestimated.

When workers who have needed to interrupt their employment are ready to return to the labour market, vocational guidance, refresher

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(1) Having investigated the main factors affecting the re-entry of women to the labour market in seven European countries and in North America, the conclusion was that the increasingly common re-entry of older married women into the labour market depended largely on the availability of part-time employment: "many countries stressed the need for more part-time openings". Re-entry of women to the labour market after a period of interruption, OECD, Paris, 1971, pages 127-28

(2) Part-time employment, its extent and its problems, Paris, OECD 1968

courses and training programmes may be needed to make up for the long period of absence, including that due to long-term unemployment. Timetables and teaching methods adapted to the needs of adults will be required, as will financial aid for their training and re-integration into the labour force. During prolonged absences of several years from the labour market, conditions may have changed considerably. Certain jobs may disappear and the demand for certain kinds of labour may increase or decrease; for example, demand for office employees may decrease due to automation, while the number of skilled and technical job vacancies may grow. Where this is the case, vocational courses and recurrent education enable those returning to the labour market to update their skills or learn new ones, rather than be obliged to accept unskilled work.

Extensive or conclusive data are not available for a detailed evaluation of the flexible career patterns outlined above in terms of costs and benefits to society, employers and workers themselves. A provisional general conclusion can however be drawn. Flexibility in daily, weekly, monthly or yearly working hours, and opportunities for alternating periods of full-time employment, part-time employment and non-gainful activity with the minimum of disruption during their working lives would be of advantage to all categories of workers. As against objections based on the cost of measures to enable persons with several demands upon their time to remain in the labour market should be set great potential benefits to the economy. Among them are the full use of human resources, increased production and purchasing power, savings on social benefits that would otherwise need to be paid to those who without flexible time arrangements would be unable to undertake employment, increased receipts from taxation and social security contributions, and further job creation in services used by gainfully employed parents.

Men and women should have the same opportunities for interrupting and resuming employment when necessary. One of the aims of time flexibility is to dispel the preconceived idea that women are the only workers who take leaves of absence and can therefore be restricted to certain occupations or career levels. Equalising the continuity of employment between the sexes would also increase autonomous social security and pension rights (1).

The measures outlined above have not been directly concerned with the total length of working hours, but rather with their flexible organisation. However, the Working Party while conscious of the economic and political difficulties involved in certain countries,

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(1) The question of autonomous social security rights is discussed below, Chapter VI

believes that adequate long term progress towards lightening the burden of parents who undertake gainful employment involves the reduction of total working hours. It is important that this should be done on a daily basis, and not in the form of longer holidays or fewer working days per week, as this could exacerbate the problems of parents.

Recognition is growing that only when the organisation of work is adapted to the needs of workers and their families in a way that does not deprive children of contact with their parents, women of equal opportunities for the exercise of non-mother roles, and men of the possibility of sharing in the home care of their children, can equality become the condition of all in our societies.

V

CHILD CARE FOR WORKING PARENTS

A decade ago, the OECD Manpower and Social Affairs Committee recognised the importance of child care as a major component of a manpower policy designed to achieve "the highest sustainable economic growth and employment and a rising standard of living" by promoting "the most productive employment of all workers with due account of their potential skills and abilities" and removing as far as possible "obstacles to the employment of those who wish to join the labour force". One of the population groups most concerned by these objectives was the large number of unemployed women, particularly those with family responsibilities, and an enquiry was undertaken among Member countries to determine their problems and what could be done to facilitate their participation in the labour force. The ensuing report made clear that the provision of adequate and convenient community services, including facilities for child care, would relieve the burden of those who assume multiple responsibilities, advance the well-being of individuals, families and society, and facilitate employment, while helping to avoid undesirable social consequences that might result from concurrent responsibilities for the family and employment(1).

The Committee's recommendations on the employment of workers with family responsibilities included: adjustments in working schedules, as well as in hours of operation of services for the benefit of the working population; the regularisation of part-time employment; and the promotion of community services with qualified personnel to provide home help, nurseries and child-care services for all children of gainfully employed parents, after-school care, school lunches, and leisure facilities for children during holidays. With the same focus on employment opportunity, the present report does not concern itself in depth with psychological or pedagogical problems which are studied in educational circles, but considers the question of care services needed by working parents so that

(1) Conclusions of the Manpower and Social Affairs Committee on "Implementing an Active Manpower Policy", OECD, Paris, January 1968.

they can combine gainful employment and family life in a more harmonious manner.

CHILD CARE AND CHANGING ROLES

One element in the increase of female participation in the labour force, documented in Chapter I, is the tendency of women of prime childbearing age to remain in employment(1). Detailed comparable statistics for mothers of young children in employment are difficult to compile. However, as both the labour force participation rate and the maternity rate has increased for the 20-24 age group, it may be assumed that more mothers of young children are employed. This hypothesis is supported by available statistics, which show that in the countries concerned, while participation is influenced by numbers and ages of children, its rate has been increasing. In Sweden, for example, 37 per cent of mothers of preschool children were employed in 1965, 57 per cent in 1974, and 66 per cent by 1977; in the United States, 18.6 per cent in 1960, and 30.1 per cent in 1972. The participation rate in Denmark was 50 per cent (1973), in Italy, 40 per cent (1973) and in Canada, 47.4 per cent (1972).

To take the example of Canada, the Women's Bureau of the Canadian Ministry of Labour estimates that as of 31st March, 1976, 1,282,000 mothers with 2,614,000 children under the age of 16 were in the work force. As is true in other countries, a significant number of mothers with young children are involved: 275,000 of the children were under the age of 3 and 345,000 under the age of 6. Evidently, in a number of countries, the presence of young children no longer has such a strong inhibiting influence on mothers' work outside the home as in the past.

These changes, the causes of which have been analysed above (p. 15 - 27), reflect a wide contemporary social phenomenon linked with economic developments, changes in marital relationships, evolution in traditional sex roles and the issue of equal rights and opportunities for women.

Housekeeping and child-rearing often take as much time as a paid job, if not more, and gainfully employed mothers spend only slightly fewer hours at these activities than those who remain at home full-time. While some men do take a share of the responsibilities, studies have shown that generally they tend to take on only selected tasks and contribute a very small part of the total hours devoted to housekeeping. In fact, the husband spends little more

(1) See above, p. 25 - 28.

time doing household duties when the wife works outside the home than when she does not. A study of United States households(1) reported that in families where the wife has gainful employment, the husband participates in housework from one to three hours per day, while the employed wife spends between four and eight hours. The participation of all family members together was found to depend on the number and ages of the children and the age of the wife.

Table 14

MARRIED WOMEN PARTICIPATION RATES BY SPECIFIC AGE GROUP

(Percentage of labour force participants of each age group who are married)

Country	Age group	
	20-24	25-29
Denmark (1973)	64.0	64.7
Germany (1974)	61.1	44.9
Ireland (1971)	15.2	7.4
Norway (1974)	34.3	50.7
Sweden (1974)	61.3	67.3
United Kingdom (1972)	59.6	49.0
United States (1974)	51.4	44.2

Source: OECD, Labour Force Statistics, 1963-1974, Paris, 1976, p.21.

The reduction in the size of the modern family and the alteration in living conditions have resulted in the parents having to assume greater responsibility for the care and up-bringing of children because grandparents and older children, in some cases even one of the parents, are less frequently present to share it. Even when children are cared for outside the home, it is still often the mother who makes the arrangements, who delivers and collects them, and who stays at home to care for them when they are ill. When the children reach school age, it is usually also the mother who is expected to supplement their formal schooling by providing extracurricular learning opportunities and supervising their homework.

Men are fortunately less and less imprisoned in their traditional roles and, if they had a real choice in the matter, might

(1) Alice H. Cook, The Working Mother; New York State School of Industrial and Labor Relations, Cornell University, 1975.

well prefer to devote more time and attention to home and family. Today they are better able to do so, thanks to flexible working hours and conditions of employment. But they still suffer from the cultural bias that makes it socially difficult. Thus the goal of equality between the sexes implies changes in men's conditions and life patterns as well as women's. Although progress in the direction of greater inter-changeability of male and female roles is occurring, its pace will probably remain slow, especially with respect to parenthood. One way to raise the interest of men in child-care activities would be to recruit them as staff members of the child care centres, which are presently staffed almost entirely by women.

The participation of women in the labour force and their freedom to engage in activities outside the home therefore continues to depend to a great extent on the availability and accessibility of alternative care arrangements for their young children. These are all the more necessary because changes in family structure and living conditions have made it difficult for some families to provide the physical care and the developmental stimulus their children require. The rising participation of women in the labour market has become a feature of the growing demand for public facilities and has made child care a most important social issue.

THE CURRENT PUBLIC POLICY RESPONSE

The Existing Supply of Facilities

While the supply of child-care facilities has increased in many countries in the last decade, both by construction of new institutions and by expansion of existing arrangements, it has not kept pace with demand and there is a universal shortage of adequate facilities for all age groups. This shortage is due not only to lack of resources but also to the double requirement, frequently mandated by legislation, that publicly provided care be simultaneously inexpensive and of a certain quality. Existing care systems in most countries are based on fairly rigidly differentiated age-related requirements.

For CHILDREN UNDER THREE YEARS OLD, the major forms of organised care include day-care centres and family day care. Day-care centres are buildings or parts of buildings specifically designated for out-of-home, institutional, daytime care of groups of from 10 to 60 healthy children subdivided into smaller age-related or family groups, under the supervision of trained, qualified staff.

The centres are operated by health and/or welfare authorities, offer part-time or, more often, full-day care, and are generally open 8 to 12 hours, five days a week, all the year round. Family

day-care is an arrangement whereby mothers of young children are allowed to take a limited number of other children (generally fewer than six) into their homes and are submitted to various degrees of supervision, such as registration affiliation with a centre, inspection of the premises and visits from welfare workers.

In the United Kingdom a small number of handicapped children are included in day nurseries. There is still a serious shortage of full-day care centres for so-called "priority children" with some special social or health need of day care: those whose parents have no choice but to take gainful employment or who are unable to take full care of them, and physically or mentally handicapped children. The view is that any expansion must continue to be first directed towards meeting their needs.

In the United Kingdom the maximum size recommended for a day nursery is 50 places. The tendency has been for smaller units in recent years. Children in day nurseries are now usually divided into family groups rather than age-related groups. In family day-care - i.e. child-minding - a single-handed minder may not normally care for more than three children under five years of age including any of her own. There has recently been a growth in the number of local authorities who are providing schemes of support and advice, including training and opportunities for get-togethers with other minders, and the provision of toy kits and basic safety equipment.

Coverage in both types of organised public facility ranges from less than one per cent of the age cohort in Germany to 37 per cent in Belgium, average enrolment being between 20 and 25 per cent(1). Owing to the shortage of places in both types of public provision (only in countries where provision for children aged three to six has reached nearly 100 per cent have facilities been increased for the under-threes in recent years), there is a considerable amount of private, unregulated, informal day-care for this age group in most countries.

Services for these very young children are primarily designed to ensure **physical** care and protection while their parents are at work or otherwise unable to look after them. For the United States, however, there is no sharp line between age groups (0-6) in terms of standards of service, provided that all include an educational and a developmental component as well as purely physical care and hygiene for the children under three.

The policy objective in some countries is to maximise the choice

(1) See Sheila B. Kamerman, Child Care Programmes in Nine Countries, DHEW Publication No(OHD)76-30080, Table 2, pp.23-4. The Role of Women in the Economy, OECD, Paris, 1975, Table 27, pp. 76-7.

of parents between staying at home and going out to work, regardless of economic need or labour-market demand. In other countries, it is to ensure the availability of women workers, while taking account of variations in economic and labour-market need. In still others, the objective is to meet only those needs that are clearly based on economic or social factors(1), and the emphasis is on safeguarding the traditional role of the family, and especially the mother, in the upbringing of children by encouraging women to stay at home. This may be done by the attribution of allowances or benefits of various kinds.

In Austria, for example, it is generally considered that most, if not all, children under three should be cared for by their mothers in their own homes. Demand for facilities is relatively low, and public policy is to provide only as many crèches as are essential to cover obvious need, but as few as possible. Since the present Maternity Protection Law(2) provides for the possibility of extending maternity leave up to 12 months after confinement in order to enable the mother to care for her child during its first year, there are only a few hundred crèche places for children under one whose mothers are unable to look after them. This period of voluntary maternity leave will not be considered for seniority bonuses, compensation for long working contracts or legal pay-rises, but will count towards retirement.

Since January 1961 unemployment insurance has provided cash benefits to a mother following legal maternity leave, up to one year after confinement: if she has been gainfully employed and had contributed to unemployment insurance for 52 weeks within a period of 24 months preceding her first application, or for 20 weeks during the 12 months preceding her second or further applications; if she gives birth prior to her 20th birthday; if she is an apprentice or a student of one of the medical institutions (nurse, medical laboratory technician, dental surgery assistant, etc.); if she is on voluntary maternity leave, on condition that she was entitled to a weekly maternity allowance before she or her employer terminated the working contract in consequence of the pregnancy or the confinement; provided she takes care of the child in her home. Crèche places are available for only about 2 per cent of children aged 1 to 3, the great majority of which are occupied by children both of whose parents are in gainful employment.

(1) See Early Childhood and Education, OECD Centre for Educational Research and Innovation, Paris, 1977.

(2) See The Status of Women in Austria, Federal Ministry of Social Affairs, Vienna, 1976.

In France, although expansion of facilities has taken place and there are ambitious plans for the future in response to the policy objective of maximising women's choice, only 15 per cent of the under-three age group are currently accommodated in full day care facilities, two-thirds in crèches, one-third in family day care. While this percentage includes more than half the children under three whose mothers work, unmet need remains considerable. Consequently, private, informal, unsupervised services are both necessary and prevalent: relatives currently supply 33.5 per cent of all day care arrangements for children of this age group.

In Sweden, where one of the manpower policy objectives is to ensure the right to gainful employment for all, family day care has been greatly extended and covers almost twice as many children as are in public care centres.

For CHILDREN BETWEEN TWO AND A HALF OR THREE AND COMPULSORY SCHOOL AGE (from five to seven in OECD countries), there are nursery schools or kindergartens, often part of the public elementary or primary school system, administered by the education ministry. School activities may be part-day, full-day (usually six hours), or sessional, and supplementary programmes for before- and after-school care may or may not be provided in the same location.

Coverage for these children is much more extensive and is expanding faster, in response to greater demand, than for younger children. Indeed, there is a trend in many countries towards universal coverage, though enrolment remains voluntary. At present, for the age group as a whole, enrolment varies between 28 per cent in Canada, 50 to 60 per cent in Germany, Sweden and the United States, and 85 to 90 per cent in France and Belgium. Participation rates rise substantially in every country as compulsory school age approaches. In many countries, in fact, enrolment for the immediate pre-primary year nears 100 per cent. While this age group is given priority in all countries for public programme expansion, private or voluntary agency provision is still important in some, such as Italy, where 82 per cent of the kindergartens are private, Canada, where over 50 per cent are private, and Germany, where 75 per cent of the kindergartens are operated by voluntary agencies.

A concern with the educational and/or developmental requirements of children dominates policy objectives for this age group, as well as, in many countries, equalisation of life chances through compensation for economic, social and cultural deprivation. Nursery schools and kindergartens provide age-subdivided programmes that emphasize either social development or cognitive preparation for compulsory schooling, or some combination of the two. Care for children of gainfully employed parents is also among the objectives of these institutions, though the extent and duration of such care

varies.

Many kindergarten programmes are part-day or sessional, and even full-day programmes (six hours) do not cover full-time working hours. Since a relatively small proportion of kindergartens offer before and after-school care facilities, day-care arrangements are equally necessary for children of working parents of this age group. Centres and family day care may provide some of this supplementary care, along with organised play groups, but due to the shortage of places, informal arrangements predominate for out-of-school hours when both parents are employed full-time. The problem seems to have been neatly solved in Sweden's joint child centres, where pre-school classes, play schools and day nurseries serving children from six months to seven years old are combined in a facility open from 6.30 a.m. to 7.00 p.m., providing both a beneficial continuity of care experience for the children and maximum convenience for parents. In the United Kingdom the less formal types of care - such as day fostering and childminding - lend themselves more readily to flexible hours, including early morning or evening care. It is also possible to carry on this type of arrangement once a child has started school, so that care is available during out-of-school hours and school holidays. A child need not attend one form of provision exclusively. For example, day-nursery attendance can be coupled with attendance at a nearby playgroup or nursery school or class, and a child with a minder can also attend other forms of provision for part of the day. There are some combined day nursery/nursery school centres, but the concept of family day centres lends itself to a greater degree of flexibility and variety, such as provision for "latch-key" children to join young brothers and sisters already in day care. The United Kingdom is looking to the development of a wide and integrated range of day-care services which will allow a broad and flexible use of all resources to meet the needs of individual families.

Germany, inspired by a somewhat similar programme in Sweden, started in 1973 an experiment involving 'day mothers'. It was undertaken with the collaboration of the Federal Ministry for Youth, Family and Health, the Länder, and the German Institute for Youth. Among the aims of the programme were that of increasing the educational skills and qualifications of the staff of pre-school educational establishments for children above the age of four, and of enabling parents to take care of their children during the first three years of their lives by providing various forms of assistance to those who interrupted their employment in order to do so. However, as an increasing number of parents could not leave their jobs, it was intended that care facilities for children under three should be quantitatively and qualitatively improved in order to avoid as

far as possible the separation of young children from their parents in children's homes. Care facilities were therefore to be provided by well-trained 'day mothers'.

The experiment explored the feasibility of integrating 'day mothers' into existing facilities - crèches, kindergartens, etc. It demonstrated the extent to which properly trained day mothers were able to help parents in their educational tasks. It tested the possibility of providing support for the 'day mothers' from social workers and education experts. Finally, it examined the degree to which the 'social safety' of families of gainfully employed parents could be augmented.

To have the right to a 'day mother', the parents had to be in employment; children from socially disadvantaged families were to have priority. The 'day mother' could take care of up to three children in her own home. She had to co-operate with the parents, receive preparatory training, collaborate with counsellors, social workers and the educationalists directing the experiment. In the main area of the experiment, 15 to 20 'day mothers' worked and were paid from public funds (41.3 per cent earning DM 1,000 - 1,500 per month, and 52 per cent DM 1,500 - 3,000). Expert working parties met regularly in the towns concerned to evaluate the results. Altogether, the project involved 171 'day mothers', 107 of their own children, and 225 children in care and their parents, both couples and single parents.

A detailed description is available of the different roles assigned to all those taking part - sociologists, counsellors, educationalists, parents, children and 'day mothers'(1). The results showed not only that 'day mothers' can help working parents and provide a second home for the child, but also that they themselves find in their activity an interesting source of income and discover that they can co-operate with other socio-professional groups in the community. Parents become friends with the 'day mothers' and this adds to the interest taken in the children's education.

Organised AFTER SCHOOL CARE for primary-school children aged from 6 to 12 is a need that is poorly met in all countries at present. Though there is little data on the provision of such services, available evidence suggests that places for children of this age group in existing care facilities are extremely limited. Consequently, most parents have to make individual arrangements for private paid care, for supervision by family members or neighbours, or leave their children without care after school, apparently a fairly

(1) Zwei Jahre Modell Projekt "Tagesmütter", Bundesministerium für Jugend, Familie und Gesundheit (1976).

prevalent practice. These "latch-key children" - so called because they often carry a key to the family home on a cord round their necks - have to let themselves in after school and are left to their own devices until the parents return from work.

Supervised playgrounds fill some of the need for after-school care in Finland, and Swedish day-care centres often have a section where older children can report in before and after school. In fact, all the Scandinavian countries have instituted "park mothers" who supervise children's afternoon activities outdoors. Japan has one care centre for schoolchildren for every two primary schools in large cities.

Some primary schools do offer voluntary supplementary programmes, including supervised study sessions and/or extracurricular activities. However, the contribution of the school system to after-school care, although expanding, is still limited in most countries. In recognition of this situation, it has been reported that many communities in a number of countries have decided to set aside some 20 per cent of all new care places for primary schoolchildren, though actual provision may not materialise for some time. In the United Kingdom this is a local matter and provision varies from area to area but many social services departments and local education authorities are using their powers to provide facilities often in conjunction with voluntary organisations. Help has been given under the Urban Programme to assist local authorities to operate out-of-school care and play schemes. Developments in this field, however, have been hampered by severe limitations on resources. The extent to which school buildings could be more widely used for out-of-school care for the children of employed parents - activities (art, drama, etc.) which include whole family groups, specialised groups of adolescents with a rehabilitative purpose and so on - is currently under consideration. Childminding arrangements made during a child's pre-school years can be continued once the child has started school and can be of use here, as can initiatives from within the community.

DURING SCHOOL HOLIDAYS, the care problem can be acute, especially for low-income working parents since, here again, provision of alternative public care arrangements is generally inadequate and the parents usually have to try to arrange their own leave to correspond with the school schedule. Even then, the parents' leave may be considerably shorter than their children's school holiday. In Europe, publicly organised residential summer camps are not uncommon, and these are available to groups of young schoolchildren on a rotating basis for part of the long school vacation. In France and Belgium, these are supplemented by "fresh air" care centres on the outskirts of towns which offer full-day supervised activities, meals and

communal transport. On the other hand, parents who can neither afford to pay for an alternative arrangement such as these, nor send their children to relatives, often face serious difficulties.

The problem of short school holidays is solved to some extent by existing care centres and family day care and, in France, for example, by school-organised class trips. Nevertheless, private arrangements for holiday care of children predominate in most countries. During summer and other school breaks some centres do make provision for the school age child - especially if a younger child from the same family is enrolled in the centre. The majority of parents arrange with a relative, neighbour, or a high school student for care of their children during these periods of time.

In sum, while many countries have provided increased child-care services in recent years, and a number of them have ambitious plans to do more, expansion so far seems to have been concentrated in part-time facilities, mainly of the traditional nursery school/kindergarten type, and thus mainly for the three to six age group. Current demand is for more full-time provision of services, not only for children under compulsory school age, including those under three, but also for primary schoolchildren in the form of after-school and holiday care. For example in Canada day-care programmes for the young school age child have only recently received attention. As of March 1976 there were slightly more than 7,000 day-care spaces for this age group. This represented a 56 per cent increase over 1975.

The Gap between Supply and Demand

To the extent that available assessments of coverage in existing public care facilities, whether estimated or based on actual figures, do not always distinguish between part-day and full-day provision, the gap between supply (in terms of number of places available) and demand may be even greater than it appears. Obviously, even a universal system which is only part-day is patently inadequate for working parents, as is a system that operates on the same yearly schedule as the school system without providing alternative care arrangements for children during short and long holidays.

Since the number of places actually available in all types of care systems for all age groups is limited (except perhaps in Belgian and French kindergartens and pre-school year classes in some countries, which may be considered universal), priorities have had to be established for use of existing facilities. These are often based on presumptive need and, of course, the relative importance of the population groups to be served. While the definition of presumptive need varies among countries, first priority is generally given to children whose parents are gainfully employed

(especially single parents and those in the lowest income brackets), or children of ill or disabled parents, of student parents, children from deprived and inadequate families, and children with handicaps. Further priorities based on a child's age and social maturity may be applied for pre-school programmes where places are limited.

Canada is a good example. Since the mid 1960s day care has been growing rapidly. The greatest rate of growth occurred in 1973-74. In 1976 it was experiencing a much more modest but still significant growth rate of over 19 per cent. However, there are several indications that this rate of growth will be considerably lower during the next few years. As is true in other countries, the demand continues to be greater than the supply and priorities have been established. Approximately 56 per cent of the day-care spaces are under the auspices of community boards, are publicly owned, or are run by parent co-operatives. About 70 per cent of the children in these centres are from one-parent families whose day-care costs are being subsidised. The remaining 44 per cent of the day-care spaces are under commercial auspices. A number of families using these centres are also being subsidised, but presumably the majority represent middle income groups.

In order for the Canadian Federal Government to be able to share in subsidisation of families wanting day-care services, the families must have, in addition to financial need, a social need for the service. The types of family that would meet the Federal Government's criteria for need are:

- the single parent family in which the parent is gainfully employed, attending an educational institution or undertaking medical treatment or a rehabilitation programme;
- the two parent family in which both parents are gainfully employed or one parent is employed and the other is incapacitated, attending an educational institution, undertaking medical treatment or a rehabilitation programme;
- the single parent or two parent family, whether or not either or both parents are employed, when day care is arranged or recommended by a social welfare agency either as part of a child protection scheme or on the basis of an individual assessment of special needs of the family or the child, including physical, emotional, mental, developmental, language, or other identifiable and recognised handicap; or where it is possible to document aspects of the physical, social or cultural environment which are seriously detrimental to the development of the child and to his equality of opportunity when he enters the education system; or when emergency day-care service is required to meet a short-term family crisis.

In many countries, actual use of care facilities, even by those with greatest need and priority access, is effectively limited by the financial cost of the service, to some extent by parents' socio-economic and cultural background, and by the problems of transporting children, as well as those related to hours and days of operation of the facilities. Consequently, a disproportionate number of the limited places in both day-care facilities and pre-school programmes may be occupied by children of middle-class families.

Since the current shortage of places in existing facilities is not only very real but cannot be substantially alleviated in the short term, working parents have to find alternatives. In the long run the gap might even worsen, since all persons, married or single, with or without children, have the same right to employment and to exercise that right. Whether the child-care gap in fact widens or narrows depends in most countries on the direction of government policy.

In the meantime, many, if not most, gainfully employed parents with children of pre-school age arrange for them to be cared for at home, most often by a relative, or a paid child-minder, or at the home of someone else - grandparent, other relative, neighbour, or paid child-minder.

In a nationwide survey of 1,300 gainfully employed women conducted in France in mid 1971(1), 41 per cent had one or more children living at home. Of the 542 children, 166 or 30 per cent were under six; 96 under three, 70 from three to five years old. In reply to the question, "How is your child of under three years cared for during the day while you are at work?", the following answers were obtained. (Because of multiple replies, the total exceeds 100 per cent.)

	%	
Within the home	13.5	
Outside the home	24.0	(see remarks below)
By a grandmother	25.0	
By another relative	9.0	
By an unpaid person	3.0	
By a paid person	14.6	
By a registered child-minder	15.6	
By a household employee	1.0	
In a crèche	4.2	
By a nurse (nourrice) on a monthly basis	7.3	
Other solutions	3.0	
No reply	13.0	

(1) Evelyne Sullerot, Les Françaises au Travail; Hachette, Paris, 1973.

The author of the survey draws attention to the high proportion of interviewees who chose not to reply to this question, which evidently caused embarrassment and discomfort. The hypothesis put forward for this reticence is the feeling of guilt the question aroused in mothers of very young children who leave them all day in the care of others. With respect to care outside the home, it is much more frequent than suggested by the above percentage, which would have to be adjusted to include all the care arrangements that actually do involve taking the child elsewhere. The replies indicate, in any case, that 42.7 per cent of the care solutions involve payment. The low figure for care in a crèche is considered indicative not only of the shortage of such facilities, but also of the preference for informal family or neighbourhood arrangements where the childminder is well-known to the parents. Care outside the home is much less frequent when there is more than one child, both because the mother frequently stops working after the birth of a second child and because care costs are too high for more than one child at a time.

Another survey concerning women teachers took place in April 1972, in Austria(1). It shows that child care is a difficult problem for mothers employed in teaching. The choice of the type of care is related to the age of the children, as can be seen below. Some 1,976 children (aged 0-14) of the women teachers used in the survey were taken care of as follows:

64.8 per cent at home
12.4 " " in the home of a relative
5.1 " " in the home of a neighbour
2.0 " " in day care (near the school)
12.5 " " in day care or children's homes separated from school
2.0 " " in part-time boarding institutions
1.2 " " in full-time boarding institutions.

The analysis by age of the children shows that during the first three years two out of three children are taken care of at home, 18 per cent by relatives and 11 per cent by neighbours. Of the preschool children from three to five years of age, 45 per cent are taken care of at home. The percentage of children entrusted to day-care facilities increased from 22.6 per cent for those aged between three and four to 39.3 per cent for those aged between four and five and 45.3 per cent for those aged between five and six years. The help of relatives and neighbours thus diminishes for the children

(1) Schriftenreihe des Bundesministeriums für Unterricht und Kunst, Band 8 - Teilzeitsbeschäftigung für Lehrerinnen an weiterführenden Schulen, Vienna, 1975.

aged between three and six years old. Of the schoolchildren between six and ten years, 69 per cent are at home, 11.8 per cent are supervised by relatives and 3.6 per cent by neighbours; 8.4 per cent are in specialised institutions separated from the school; 3.6 per cent in care centres within the school; 3.4 per cent in part-time boarding schools and 0.2 per cent in full-time boarding schools. As to the children aged between 10 and 14, 83.2 per cent are at home, 3.3 per cent with relatives, 0.5 per cent with neighbours, 4.6 per cent in part-time boarding homes, 4.1 per cent in full-time boarding homes, 2.3 per cent in institutions separated from school and 2 per cent in institutions within the school. For those aged from 14 to 18, 92.7 per cent stay at home while their mother is out at work.

One of the conclusions of this survey is that women teachers might have to abandon their profession because they cannot find appropriate care facilities, particularly for their pre-school age children.

Informal arrangements such as those described in the above surveys - unregulated, unlicensed, mostly custodial in nature - are the predominant mode of care in virtually all countries. Their prevalance is related to convenience and cost factors, parents' confidence in the person or persons to whom they are willing to entrust their young children and, of course, to the shortage or even absence of alternative organised facilities. In some countries these informal arrangements seem to be preferred on the grounds that the children are considered to receive better care, particularly in the United States, where child care is taught in high school to both sexes.

Non-governmental child care arrangements may be provided or sponsored by factories and firms or jointly by employers and unions, though the availability of such facilities is usually contingent on the demand for women's labour. Except with nursing mothers, these are not very popular, even though hours of operation correspond to work schedules, in view of the need to transport the children often over long distances in public conveyances during rush hours. Factory surroundings are also considered undesirable environments for children, and parents generally prefer them to remain in the neighbourhood where the family lives, even though child care may be a fringe benefit of their jobs.

Comparative Approaches to Providing Child Care

National attitudes towards the division of responsibilities between families and society with respect to the raising and well-being of children are a major influence on a country's approach to

child-care policy and they determine the concept, content and organisation of care.

Attitudes concerning the role of society in the care and development of children range from non-involvement or limited involvement, in the belief that parents themselves should assume maximum responsibility for their children virtually up to compulsory school age, to active policy-making and programming for pre-school children in response to the conviction that society should play a substantial role.

The former view is prevalent in the United States and to a certain extent, in Germany and Switzerland, where private and voluntary agencies, rather than public agencies, play the major role in providing child care. In Germany and Switzerland, the absence of a major system of organised care reflects not only the importance attached to the traditional role of the family in children's early years but also the generally low demand for public provision. In the United States, although voluntary agencies providing non-profit care arrangements receive funds from the Federal Government, which also sets general standards and some guidelines, Federal Government involvement in both standard-setting and financing is minimal. The latter is essentially restricted to offset aid to mothers on welfare or in danger of going on welfare if their child-care expenses are not met from external sources, and to the deduction of such costs from income tax.

The latter view is shared in varying degrees by most countries of Europe, Japan, New Zealand, Australia and Canada, which have some system of publicly supported, publicly regulated and, often, publicly operated pre-primary care facilities. Governmental involvement may include setting standards for facilities and personnel, and providing capital grants for land purchase and construction of institutions and recurrent grants to help meet operating costs. In the United Kingdom local authorities provide day-care facilities and have power of registration and inspection in respect of private facilities under the Nurseries and Childminders Registration Act of 1948, as amended. In Canada, day care falls under provincial jurisdiction. Therefore, the provinces and municipalities are the ones that have determined licensing standards, patterns and models of delivery. Every province now has established standards (see below, pages 151-152).

The structure of organised child care follows three main patterns (see Table 15). The first involves either two separate, consecutive, age-related systems (0-3, 3-6) with different orientations, under the administrative responsibility of health/welfare and education ministries respectively, as in France, Belgium or the Netherlands, or two parallel systems, in which division of ministerial responsibility is based on function (care/education) rather than age,

with kindergarten beginning in the middle of the age cohort covered by day care, as in the United Kingdom or New Zealand. Provision is largely public, with policy being set by the central government and programmes administered and operated locally. In New Zealand, the government's policy is that while the family should remain the paramount unit for child care in the community, it is recognised that there are a number of pre-school children who need alternative care outside the family home. Government assistance is provided to voluntary organisations providing day-care facilities. Here again, the government in providing child-minding facilities, takes the parents' real needs into account. The subsidised child-minding facilities are available only to those who have not the means to pay for such services.

In the second pattern, two or more partially age-related systems exist and several ministries, including health, welfare, labour and education, may be involved. Provision is largely by private profit-making or voluntary non-profit-making agencies rather than by public agencies. Policy-making and subsidising are variously divided among central, state and local governments, and administration and operation are a state or local matter involving several agencies, as in Canada or the United States. In Canada, it is considered that day care should not only meet the total developmental needs of children, including cognitive development, but also strengthen family life. It is felt that this double objective is best served by having day care remain separate from education and firmly under the control of the community. While pre-school education is seen as a vital part of the overall programme, co-operation and inputs from various related departments are favoured. Thus a pluridisciplinary approach with multiple service models is preferred.

In many cases, lack of co-ordination between systems and among responsible government departments is a weakness of these two patterns of care. In countries that have a federal structure, the situation is more complicated since the central government generally has only slight responsibilities in the pre-school sector and often the state departments of education (Cantons in Switzerland, Länder in Germany, Provinces in Canada, Bundesländer in Austria) have limited responsibilities.

The third pattern is unitary, with one government department or ministry responsible for an integrated, comprehensive care system for all children from a few months old to compulsory school age, with little distinction between care and education at any age. This exists in Sweden, Norway, Finland and to some extent Denmark. Policy is set by the central government and programmes are developed, operated and supervised at local level. Germany also partially follows this pattern with respect to children aged three and over, for

whom there is a single system, under the guidance of the Ministry of Youth, Family and Health, with policy set at state and local level and programmes operated primarily (75 per cent) by voluntary agencies.

While all countries have some system of public subsidies for child care, the manner in which they are used varies widely and ranges from financing publicly-operated day-care centres or subsidising smaller publicly-supervised facilities to provision of parental allowances, parental leaves under the social insurance system, or income tax deductions for child-care expenses. Funding of facilities is often shared by national, regional and local governments, while voluntary agencies, employers and parents may participate to various degrees (see Table 16 on Eligibility Criteria and Methods of Payment).

State participation in financing mostly takes the form of grants to local authorities for construction of facilities and, in some cases, contributions to operating costs. The central governments' share in the latter is rising almost everywhere, covering up to 80 per cent of costs, depending on the resources of the municipality operating the facility. Control may be vested in a central government ministry or ministries, which also make decisions about provisions and standards, as in France, or it may be provincial, as in Canada. The Canadian Federal Government shares on a 50 per cent basis the cost to provinces and municipalities of providing day care to families who are in need or who are likely to become in need if they do not receive the service. The federal government does not share in capital costs for day care but will share in depreciation costs. It also provides for an income tax deduction per child up to a maximum annual limit per family. Control can be entirely local, as in Denmark, where municipalities receive a 50 per cent across-the-board subsidy for all social services and consequently are responsible for decision-making with respect to child-care.

Industry's share in the financing of child care is increasing in Sweden through increased taxes, in response to the argument that since industry profits most directly from increased female labour force participation, it should contribute more than it has done to the provision of child-care services which enable women to work. In Canada, outside universities, community colleges and a few hospitals, day-care has not been provided by employers. The general position taken by day-care authorities is that many places of work do not lend themselves to safe day-care facilities and that most parents prefer centres in their immediate neighbourhood. However, they would like to see co-operative endeavours where employers, in return for some day-care spaces for their employees, would provide financial

Table 15

THE STRUCTURE OF CHILD CARE IN EACH COUNTRY(a)

(Number of Separate Child Care Systems by Major Structural Variations)

Country	No. of Systems	Age Related or Not	Auspice			Administrative Responsibility	Responsible Level of Government		
			Public	Voluntary	Proprietary		National	State(b)	Local
Canada	Two	Partially	Yes	Major	Major	Departments of: Welfare; Health; Education	Minor	Sets Policy	Implements Programmes
France	Two	Yes Crèche: 0-3; Ecole Maternelle: 2-6	Major	Yes	NONE	Ministries of: Health & Social Security; Education	Sets Policy	-	Implements Programmes
Federal Republic of Germany	One	Yes Kindergarten: 3-6	Yes	Major	NONE	Federal Dept. of Youth Welfare Services; Voluntary Union of Youth Welfare Services	Minor	Sets Policy; Funds	Implements Programmes
Israel	Two	Partially	Major	Major	Yes	Ministries of: Welfare; Labour; Education	Sets Policy	-	Implements Programmes
Poland	Two	Yes Nursery: 6 wks-3 yrs; Kindergarten: 3-7	Major	Yes	NONE	Ministries of: Health and Welfare; Education	Sets Policy	-	Implements Programmes
Sweden	One	Under 7	Major	Yes	Yes	Minister of Health and Social Affairs	Sets Policy	-	Implements Programmes
United Kingdom	Two	Partially	Major	Yes	Yes	Departments of: Health and Social Security; Education	Sets Policy	-	Implements Programmes
United States	Multiple	No	Yes	Major	Major	Departments of: Health, Education and Welfare; Labour	Major Public Funding Source Sets Some Policy	Sets Some Policy; Multiple Agencies Administer	Implements
Yugoslavia	Two	Yes Day Nursery: 0-4; Pre-school 4-7	Major	NONE	NONE	Jurisdictional Areas: Social Welfare; Education	Minor	Republic Sets Policy	Sets Some Policy Implements Programmes

(a) The following terms are used interchangeably: (i) day care, crèche, nursery, day nursery; (ii) kindergarten, pre-school, nursery school, école maternelle, nursery class;

(b) For countries having a middle tier of government.

Source: A. Kahn and Sheila B. Kamerman: Child Care Programmes in Nine Countries, DHEW Publications No. (OHD) 30080.

Table 16

ELIBILITY CRITERIA AND METHODS OF PAYMENT

Country	Basis		Priorities: presumptive need				Other	Payment(a)		Comments
			Social need			Diagnostic criteria		Day Care	Kindergarten	
	Universal	Selective	Working mother	One parent	Deprived (b)					
Canada	Yes	None	Yes	Yes	Yes	For special needs centres	None	Income-related fees: average fee $41-60/month full day, $20 part day	Free	Special need centre fees: $.50-$5 per day
France	Yes	None	Requirement for day care	Secondary priorities but most children are from normal families		-	Age day care: under 3; kindergarten: 2-6	Income-related fees: $.22-$5 per day	Free for basic programme. For supplementary programme flat fees: $.35 per day and $1 per meal	Informal family day care averages $150 monthly
Germany	Yes	None	Priority No.(Discretionary) 1	3	1	4	Age and order of application	Income-related fees vary among states	Full day: averages $31 monthly, half day $13.20	Proprietary full day care averages $44.00 monthly
Israel (criteria vary for each system)	Labour & education	Welfare programmes (day care)	Labour 75% Priorities for education: 3	4	Welfare 80% 1	2	Age, large family, order of application	Income-related fees	$.68-$4.25, flat fees $15.30	Proprietary care average $17.00 monthly
Poland	Yes	None	Or full-time students	-	Low income	146	If space, Health Dept. can refer children it deems needy; employees of	Income-related fees; average monthly 84 zlotys 3% of per capita family income	Basic programme free. Maximum 700 zlotys monthly, 10% of per capita monthly income for all day supplemental programmes	Family day care fees arranged informally

Sweden	Yes	None	Or full-time students 1	Priorities: 4	3	2	-	Income-related fees and related to time in care $.22-$7.50 average $1.55		
United Kingdom	Yes	None	. . Priorities: day care 1 kindergarten 1	1 1	2 1	3	-	Income-related fees	Free	Licensed family day care average $2.20 day, private kindergartens average $400/yr. Playschools average $.65/session (AM or PM)
United States	Kindergarten	Day care	Yes	Yes	Yes	Yes	Mothers receiving public assistance or work training	Income-related fees: $1546-$1181/yr for those ineligible for subsidies in public programmes	Free	Family day care average $700-$1100 per year
Yugoslavia	Yes	None	Yes	Yes	Yes	For special programmes	Children living in inadequate housing; children from large families; kindergarten may give priority to children who have been in day care programmes	Income-related fees: maximum fee, yearly, to equal about 1/6 of minimum wage		

(a) Proprietary programmes excluded; where there are income-related fees, the service is free to public assistance recipients and/or other poor.

(b) "Deprived" includes: economic, social, cultural, emotional deprivation.

Source: A. Kahn and Sheila B. Kamerman: Child Care Programmes in Nine Countries, DHEW Publications No. (OHD) 30080.

and perhaps administrative support. In other countries, such as Italy, there have been laws and/or proposals to require firms and factories of a certain size to provide child-care facilities on their premises.

In every country, parents bear a proportion of the costs of child care through the payment of a fee. In France, for example, parents' fees amount to one-third of the operating costs of crèches, and in Denmark, one-quarter. In some countries, fees are structured on a sliding scale in relation to family income. In the United Kingdom, local authorities may make reasonable charges for day care provided the charges do not exceed the total cost of the service and that the authority takes account of the means of the parents concerned. In many cases this means that no contribution is required.

The use of public subsidies for direct income transfers takes the form of either a child allowance, which can be used by the family to pay for private or public care arrangements or retained by the mother remaining at home to care for her young children, as is most often the case in Austria, for example, or of tax deductions to offset child-care expenses in part or in whole, related or not to family income, as is prevalent in the United States. It is not possible, without going into great detail, to deal with alternative means of financing expansion of coverage. Nor has it been possible to discuss the advantages and disadvantages of the various experiences in Member countries, to answer such questions as the extent to which public provision is a necessary replacement of private services which would exist in any case, or whether the improvement of informal systems would be cheaper than more public institutional provision.

THE DEVELOPMENT OF A PROGRAMME

The harmful or beneficial effects of institutional and other care arrangements both inside and outside the home on the welfare and development of young children are the subject of controversy among experts. While parental employment in itself appears to have no harmful effects, children's development can be affected by the quality and consistency of the alternate child-care arrangements, the attitude of other family members to the situation, and the parents' own satisfaction with their work which will affect their behaviour as parents during non-working hours. The attitude of other family members towards the parents' employment can indirectly affect children - adversely, if there is disapproval and consequently tension in family relations. Similarly, the parents' frustration over

not taking a job when they would like to can make them worse parents than if they did take up paid employment despite disapproval. If employment increases a person's self-esteem, it can have salutary effects on the family relationship, while the contrary can be detrimental to it.

While little research has been done on the subject, there exists an assumption that "young children are dependent for emotional security on a limited number of adults, of whom the mother (or an acceptable substitute) is usually the most important. These adults must be able to provide continuity of affection, consistency of acceptance and adequate and appropriate stimulation"(1). For infants under three, the desirable consistency in the persons giving care and in the type of care received would seem to be best achieved, if not by the parents themselves, then by a single substitute (either relative or other child-minder) in the home, although there is some evidence that group day-care centres or family day-care arrangements can provide the equivalent at appropriate standards of quality (day-mothers), while at the same time offering opportunities for social development. However, an Australian study of pre-school children has indicated that certain aspects of their behaviour were more affected by the mother's attitude towards the rearing of her children than by her employment status. Other aspects of behaviour were found to be adversely affected by separation from the mother for over six hours daily in full-day child care. Thus group care may involve psychological costs for the children. Similarly, one United States study has found that after five months in day-care centres, a group of children aged two to three showed more signs of anxiety and a greater fear of strangers than a similar group reared at home(2). There is great concern in the United States over emotional support for young children.

Lack of agreement about the need for and validity of institutional care for children under three, as well as about society's responsibility in providing it, has resulted in most countries giving far lower priority to provision of public facilities for this age group than for children over three. In addition to their inferior status in the hierarchy of social services, the institutions catering for infants are generally expected to be purely custodial in function, their care objectives limited to ensuring acceptable standards of hygiene and physical protection, while the children's needs

(1) Report by the Australian Pre-Schools Committee to the Minister for Education, 1976.

(2) The Role of Women in the Economy, OECD, Paris, 1975, pp. 85-86.

for developmental stimulation and social contact with other children and with adults are often neglected. This emphasis on custodial function probably reflects the prevailing view in many countries that day-care facilities for infants should exist merely as a safety net, to provide care and protection for children only when the parents cannot provide it themselves, either because of their jobs or because they are ill or otherwise inadequate. It also reflects the importance generally attached to the mother-child relationship in the first few years of life. If maternal care is not available, then close-relative care or some form of in-own-home care is frequently identified - rightly or wrongly - as superior to institutional care. It might then be asked why public money is not used to pay relatives to take care of children.

For pre-school children aged three to six, cognitive development demands large amounts of adult attention and stimulation, corresponding to the children's rapid rate of learning. Since research has established that 80 per cent of a child's intellectual development occurs before the age of seven, an educational orientation is considered essential in all countries in care provisions for this age group, and an institutional approach is favoured. At the same time, since healthy social development requires contact and interaction with peer groups as well as with adults, this aspect is also stressed to varying degrees in the programmes.

Since the experiences of the early years have a determining influence on all of a child's development and future life, it is generally felt that nursery schools or kindergartens providing opportunities for intellectual and social stimulation can offer a richer and more dependable environment for children of this age group than the home alone, where there is a huge variation not only in the nature and extent of educational activity but also in emotional atmosphere and even in the quality of physical care. These considerations are responsible, on the one hand, for the greater demand for and faster expansion of kindergartens and pre-primary programmes for the three to six age group than for the under-threes; on the other hand, for the emphasis in these programmes in almost every country on compensation for social, economic and cultural deprivation due to family background and/or modern urban living conditions, the objective being to give all children equal life chances through equal educational opportunity.

The wide disparity of conditions in the home certainly provides grounds for the contention that some children would get better care in a day-care centre or nursery school than in the home and that others would certainly be no worse off. But the strength of such arguments depends a great deal on the quality of the service provided. This may be said to depend on four interrelated factors:

quantity (i.e. number of places), the child-staff ratio, staff training and qualification, and the standards of physical facilities. Since there is a limit everywhere to the use of public funds for child care, it is self-evident that financial constraints can strongly influence all these factors.

In times of economic expansion, labour market demand creates great pressure for more, but not necessarily better, child care facilities. As has been pointed out,

> In its purest form, children and their needs are not the central concern of this demand; freeing both parents for work is. Labour market demand is likely to regard public expenditures on upgrading quality in existing institutions as of much lower priority than the creation of new places for greater capacity. It is likely to favour institutions with long hours of opening... and all-year care provision. The main purpose of such care facilities is to ensure that the child will be taken care of during periods when both parents are at work, at a minimum level of cost but with a certain basic level of standards so parents will be willing to entrust their children to the care system(1).

Since, even under simultaneous pressure from a number of different sources of demand, public provision of full-day child care for all parents who want it is both financially and logistically difficult to realise, even if it is considered desirable, quantity must be a function of some definition of minimum acceptable quality.

While there are differences between countries with respect to acceptable and optimum child-staff ratios, there is some consensus on the relationship between high staff-child ratios and quality of service, and on the principle that the younger the children the higher the staff-child ratio must be and the smaller the absolute size of groups. For the 0-3 age group, one trained staff member is generally expected to be responsible for no more than four or five infants, or five to eight toddlers. For instance, in the United Kingdom, in day nurseries, the recommended maximum size is 50 places (though the trend in recent years has been towards smaller units), and the recommended minimum staff ratio is 1:4 or 5. In Canada, every province now has established standards but these vary considerably from province to province. Some provinces and some municipalities insist on higher standards for centres that receive public subsidy than for the commercial centres. Generally speaking the typical staff-child ratio for the subsidised centres is 1 to 3 or

(1) Martha Darling, Care of Children of Working Parents, (OECD, mimeographed document).

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1 to 4 for the infants; 1 to 7 or 8 for children aged three to five; and 1 to 10 or 12 for the older children. In addition, every province has university and/or college courses offering degrees or diplomas in child care. Some are looking closely at models based on competence and at least one province has put this approach into effect. The Canadian Federal Government provides a consultation service on day care to provinces and to interested day-care groups. The Federal Government has also established a National Day-Care Information Centre. The situation is quite different and present standards far more variable with respect to children in the three to six age group, where staff-child ratios range from 1: 10 to 1: 40, most countries averaging 1: 20 or 1: 25. The highest ratios of children to teachers reflect the widespread shortage of kindergarten teachers, for whom improvements in status, working conditions and pay are currently being considered in a number of countries.

In view of the impact of adult-child interaction on children's development, all countries agree that the staff employed in child care is the most important single determinant of the quality of care and all require that institutional personnel be trained and qualified. However, the content and length of training and standards of qualification vary greatly both between countries and between institutions in individual countries. Up to now it has generally been considered acceptable that the training of persons caring for very young children be less extensive and their qualifications lower than for persons in charge of older children, but this view seems to be changing in the light of recent findings in the field of child development. In general, training for day-care centre staff is shorter in duration and emphasizes nursing and/or child development, while for kindergarten programmes, pedagogic training and teaching qualifications are stressed and their acquisition takes longer. Like the care system itself, training for work with children under three is usually under health or social welfare ministries, while kindergarten teachers are trained in teacher colleges under the Ministry of Education.

In the United Kingdom, the staff of day nurseries generally hold nursing qualifications. Because of the increasing use of nurseries to meet the needs of the whole family, further training is now being planned. For example, some staff will have knowledge of the effects of social and emotional deprivation; others may be equipped to work with family groups. They will be able to call upon other professionals, such as social workers, paediatricians, or child therapists, who will give advice and assistance as required.

For family day-care mothers, few qualifications are required and little training is available in most countries, with the

exception of Finland and, to some extent, France, Austria (where the Labour Market Act and its amendments provide allowances for such training), Germany (on an experimental basis), and the United Kingdom (where it is organised by local authorities). In the United Kingdom, furthermore, an effort is being made to ensure that standards in private facilities should be comparable with those found in the public equivalent. Thus local authorities may make the requirements set out in the Nurseries and Childminders Regulations Act of 1948 (as amended) a condition of registration, and many have set up schemes to extend the minders' range of facilities by, for example, linking the minders to a day nursery, providing a meeting place for local minders to share problems and explore new ways of dealing with them, ensuring that professional support can be mobilised if required, and decreasing, in these and other ways, the isolation of the minder from other community activities.

The dual orientation of personnel training, corresponding to the two separate age-related systems of care, is still prevalent in most European countries. In the Scandinavian countries, however, the differences in training concept and content between day-care and kindergarten personnel are being eliminated in harmony with the unified, comprehensive approach to all pre-primary child care in process of implementation.

With respect to physical facilities and equipment, all countries have standards and regulations with respect to size, minimum space per child, and safety, for example, but these are not consistently achieved, particularly when existing buildings not designed for the purpose are converted to expand capacity and funds are lacking for construction of new facilities. The shortage of adequate buildings is particularly acute in Italy, where, despite the paramount role of the private sector in nursery school provision, the Ministry of Education reported in 1973 that out of a total of 2,856,189 children in the three to six-year-old age group, about 1,100,000 were altogether deprived of the chance of nursery education. Consequently, rotation of classes on a part-time and even sessional basis is common, both in kindergarten and in the first years of primary school.

The location of physical facilities is an important factor in an overall appreciation of quality, and considerations of convenience, accessibility and proximity to other community resources are being increasingly taken into account, as well as hours of operation to correspond to the needs of working parents. This would help to improve the continuity between home and care facilities. Concentration of child-care and related services in one location has already been implemented on a small scale in Scandinavia. In the United Kingdom there are a number of combined nursery

centres, currently being evaluated, and a comprehensive children's centre, providing a social and medical service for pre-school children and their families, is being used to test the effectiveness of a wide range of social, educational and medical measures in identifying and meeting the needs of the children and families concerned. These models are being studied and proposals made along the same lines in other countries, such as Belgium and France.

While kindergartens are widely regarded as a normal downward extension of the state's role and responsibility in the education of young children, and administrative and regulatory competence for these institutions usually resides in the Ministry of Education, co-ordination between them and the primary schools is universally acknowledged to be inadequate even though, in many countries, such as France, Belgium, Denmark, Finland, and the United Kingdom, both often share the same premises. Increasing awareness of the psychological or emotional problems that may develop for children from the abrupt change of atmosphere, teaching methods and educational content between the two has given rise to a new concern with the issue of transition and, at the same time, new approaches to the organisation of education for the age group spanning from about four to ten years.

In some of the Scandinavian countries, extensive work on the problems of collaboration between primary schools and the care system has led to the creation of special pre-school year programmes on a voluntary basis for all six-year olds (compulsory school age is seven), while in Belgium, France and Germany, among others, special emphasis has been given to preparation for formal schooling during the last year of kindergarten. A number of countries, including the above, are seriously considering lowering compulsory school age and expanding both coverage and quality of programmes for younger kindergarten children. In France, recently introduced legislation would permit compulsory schooling to begin at the age of four in order to provide compensatory programmes for all children from deprived families without singling them out. In Germany, it has been suggested that compulsory schooling begin at five (instead of six) with a specially designed programme for the first two years, while the voluntary programme for three and four-year olds is expanded to provide universal coverage(1). In the Netherlands a more original proposed approach could lead to elimination of the transition problem by the development of a new kind of school, effectively bringing together kindergarten and primary school. This "first school" system would cover children from age four to twelve,

(1) See Early Childhood Care and Education, CERI/OECD, Paris, 1977, p.42.

kindergarten beginning at four, and primary school at six.

While there seems to be fairly widespread agreement on the downward extension of the school system's role in early childhood education, differences exist concerning the framework, as well as the additional services that the school system might be expected to provide, in the form of extracurricular programmes and care in out-of-school hours and during holidays. In Sweden and Norway, both kindergarten classes and the part-day pre-school year programmes are organised within the day nursery. Thus before and after-school care and lunches are taken care of in the same location but the transition problem remains because the pre-school year programme is physically and administratively separated from the primary school and continuity and co-ordination consequently suffer. In Denmark and Finland, on the other hard, while kindergartens are usually in day-care centres, the part-day pre-school year programmes are organised on the premises of the primary school. While this is effective from the standpoint of transition, the after-school care problem must be resolved separately, as for the primary schoolchildren themselves.

Norway has recently created some new centres which solve both the pre-primary to primary transition problem and the after-school care problem. These are conceived as day nurseries, but are open to children from 0 to 10 years old. They provide infant care, kindergarten, a pre-school year for 6-year-olds and formal primary education for the 7 to 10 age group. Denmark and France are experimenting with centres along the same lines, while Sweden is trying out after-school centres organised within the primary schools - a solution that is preferred in many countries for obvious reasons of continuity and convenience.

In France, while most existing kindergartens are full-day (six hours) and do serve a child-minding function, only 20 per cent provide complementary services for before and after-school care and lunch (for which there is a charge) so that, in most cases, mothers still have to make individual arrangements for these times. Primary schools often have canteens but no before and after-school programmes, for which demand has increased sharply in recent years. In Austria, Germany and Switzerland, the provision of lunch and before and after-school care for kindergarten children is left tc local initiative.

While many pre-primary and primary schools now provide lunch in canteens on the premises and some offer voluntary supplementary programmes, organised after-school care is a need that has been neglected up to now by most school systems. Their role in providing it is bound to expand in the face of present need and demand.

To ease the burden of multiple responsibilities assumed by working parents, adjustments can be and are being made in the

conditions of working life, at present primarily to the benefit of the mother but also, to a growing extent, for both parents.

In many countries, paid maternity leave has been extended to enable the mother herself, without substantial loss of income, to care for her infant in the early months of its life, when close continued contact between them is universally recognised as extremely important for the child. Although there is a wide variety of maternity leave and benefit schemes, most are incorporated into a national system protecting the mother's right to be in paid employment during her pregnancy and to return to her job after a set period of leave divided between the pre and post-natal periods. Australia, Canada and the United States are exceptions in that they have no uniform national regulation governing the length of leave and maternity benefits. The United States, furthermore, is the only major industrial nation without a national health insurance plan covering medical expenses for childbirth and compensation for lost income, and where maternity leave is still negotiated on an individual basis with employers, though the 1964 Civil Rights Act did give women job security, and in recent years, legal interpretations of the Act have prevented employers from laying off women because of pregnancy. A number of European countries, however, particularly those with an explicit family policy, have a wide range of welfare supports and social insurance benefits related to maternity and child care.

Paid maternity leave ranges from 16 weeks in France (extended from 14 in July, 1978) to six months in Finland and seven months in Sweden, where, in recognition of the fact that leave is as appropriate for the father as for the mother, seven months' paid leave may be taken by either parent or shared between them. In 1974, 2.4 per cent of Swedish fathers took parental leave; in 1975, 5.2 per cent; in 1976, 7.5 per cent; and in 1977, over 10 per cent. In the first year of the programme, fathers took an average of 26 days leave; by 1977, the average was 42 days. Furthermore, the parental insurance scheme entitles fathers to stay at home during the immediate pre and post-natal period to look after other children, receiving compensation equivalent to normal sickness benefits. While an increasing number of Swedish fathers take child-care leave, the fact that, in the vast majority of cases, it is the mother who stays at home is attributable to the generally lower level of her earnings as well as to traditional living patterns. However, the financial provisions, recently extended, are important in helping to make a fuller sharing of roles possible. In Japan, a scheme has recently been introduced to help women working in the private sector, by which a 'child-care leave encouragement grant' may be paid to employers who agree to guarantee

reemployment of women after maternity leave.

In Austria, maternity leave may be extended for up to a year on a voluntary basis. Since 1974, the cash benefit has been raised for such voluntary leave: it is estimated on a lump-sum basis and is increased automatically. Single mothers receive more than married mothers. Since 1st July, 1976, unemployment insurance provides cash benefits to adoptive mothers who care for a child at home during its first year. A sole-support working mother may apply for an emergency compensation as soon as the child is one year old. This compensation will be paid to her by unemployment insurance for two consecutive years if she can prove that she has nobody to care for the child in her own home. A new law on alimony enacted in 1976 provides for advance payment of alimony to mothers of minors by the State in the event that such payments are not (or not in the full amount due) made by the person responsible for them.

In France, certain benefits for low-income families are designed to facilitate child-care by the mother in her own home. These include a single-salary allowance for families with dependent children where there is only one wage earner, and an allowance for mothers staying at home in families where the only working member is self-employed, without a regular wage (e.g. farmers). In addition, for low-income families where the single parent or both parents are employed and there is a dependent child under three years of age, a day care expense allowance is given. Since 1977, parents have been able to take two years' unpaid leave in order to take care of young children, with the guarantee of finding their job when returning to employment.

With respect to arrangements for the care of a sick child, Germany has a statutory health-insurance benefit that covers the income loss of a parent for up to five days no more than once a year, while Sweden allows paid leave of 12-18 days a year for either working parent, among other things, to look after a sick child under the age of ten. According to recent (1976) data, in one-third of the families taking advantage of the parental insurance scheme to look after a sick child, the father used more than half the days taken. In Austria, in the framework of the recent legislation on paid leave (January 1977), all workers will benefit, in principle, from special paid leave, to a maximum of one week per year, when they have to take care of sick relatives living in their home. These can include children, grandchildren, adoptive or dependent children, spouse, life-companions, parents and grandparents. Since 1973, a supplement to the family allowance has been granted for handicapped children. France, Germany and Sweden provide for household helpers during short-term crises involving illness of the mother or a child, or some other family emergency. In Germany,

provision of such help or coverage of the cost is limited to families where the single parent or both parents are employed and the child is under eight or handicapped. In Sweden, there is a special nursing care allowance for parents of handicapped children.

While increasing interest is being shown in many countries in longer insured post-natal leave periods and in the possibilities of social insurance to cover salary loss of parents who stay at home when children are ill, much remains to be done to facilitate more equal sharing between parents of the responsibility for child care. Indeed, in most countries, leave following childbirth is still for women only, child allowances are mainly intended for use by women, and it is generally assumed that the mother alone is concerned by provisions for leave connected with the care of a sick child. If fathers are to share parental responsibility and duties, they must first of all be given the right to take time off to do so. This involves many of the reforms of time arrangements discussed in Chapter IV, and may also require adjustments in social security systems so as to protect rights during interruptions of full time employment, as mentioned in Chapter VI. The possibility for both sexes of interrupting their careers during short or long periods so as to engage in other activities would imply not only a redefinition of the work ethic and the redistribution throughout adult life of occasions for education and training, but acceptance of a more flexible use of time in general. This would permit greater individual choice of the pattern of living during the whole life span, and, most relevant to the present context, would also permit both parents to devote more time to their children.

POLICIES AND PRIORITIES

More women are working in paid employment than ever before, and in many countries it is among the married women and mothers of young children under compulsory school age that the rate of labour force participation has increased most rapidly over the last decade.

However, if the responsibility for the rearing of children is to be shared between spouses and between the family unit and society as a whole, adequate arrangements for child care during the working day will remain essential. This need exists independently of differing views concerning what is best for the very young child, for women, for the family unit and for society generally, and regardless of different positions regarding public support of child-care by the child's own mother or someone else, in the home or outside the home.

While numerous factors make it difficult to assess accurately

the demand for public child-care, all available evidence indicates that it clearly exceeds supply and is likely to continue increasing, particularly with respect to certain age groups of children and certain types of service, despite the decreasing birth-rate in most Member countries.

For children under three, there is no doubt about the fact that current provision is seriously inadequate in relation to demand. Furthermore, there is no consensus regarding the attitude to be adopted towards the limited existing facilities.

On the other hand, most industrialised countries have taken a clear and consistent position concerning society's responsibility for children between three years old and compulsory school age and the manner in which they are to be cared for during the day or some portion of the day. Convinced that, in the interests of child development, the community should complement the variable quantity and quality of care and education provided by the home, these countries have decided that organised, out-of-home group programmes with an educational content are important for these children, regardless of whether or not both parents have jobs. Thus the majority of children in this age group are already, or soon will be, in some form of pre-school programme, usually, though not always, under public educational auspices, subsidised by public funds and generally available free of charge or at low cost. While coverage in such programmes is already very high in several Member countries, still higher coverage is projected over the next few years, and universal coverage as soon as resources permit.

However, the question of caring for children when kindergarten or primary school is not in session remains a problem. Indeed, there is generally a gap both between the normal school day and the normal working day, and between the standard school week and year, with its various short and long holidays, and the standard work week and year. Coverage may be needed for the time before the school day begins, at lunch, after school and during school holidays. Such problems exist for most gainfully employed parents, whether they are employed part-time or full-time. Some Member countries consider that a reduction of working hours would improve family life by closing the gap between parents' work schedule and children's school schedule. A wider application of flexible time arrangements could also help reduce the problem. At present, few countries have data indicating how the children of gainfully-employed parents are cared for, and no country has full care provision for them. France has the most extensive coverage of the countries studied.

Consequently, there is a large and increasing demand for more full-day kindergartens, as well as for more full-time provision of a basically day-care or custodial type, not only for children

under compulsory school age but also for primary schoolchildren in the form of after-school and holiday care.

Nowhere has the demand for child care been met fully, and no country is currently satisfied with either the quantity or the quality of provision. Although France has a remarkable quantitative achievement to its credit, quality is far from satisfactory, with child-staff ratios of 1: 40 or even 1: 45 in its nursery schools, for example. The Minister of Education recently announced that by 1980 maximum class size will have been everywhere reduced to 35 children and all children over three will have a place in a pre-primary school if their parents wish them to attend. In the Netherlands, there is a striking contrast in both quantity and quality between day-care centres and kindergartens, to the detriment of the former. While Denmark has achieved relatively high levels of both quantity and quality provision, policy is currently under review for economic reasons. Similarly, in the United Kingdom, serious economic problems are hindering implementation of the policy of expansion for nursery school classes. The shortage of facilities in rural areas appears to be a universal problem. In France, places in rural kindergartens are so limited that the age of admission has had to be raised by two years, from three to five.

It is evident that the use of public funds for child-care has a limit in any economy, a limit determined by the priorities accorded to other demands on available resources in the area of social policy. Some countries believe that child-care policy should be a function of a country's overall family policy, and not just labour market policy - for example Norway and the United States. In any case, policies for providing care facilities should take into account women's contribution to GNP, which justifies economically the provision of child-care. The level of priority accorded to child-care provisions depends essentially on three factors: general economic circumstances, particularly as they affect the level of employment and public expenditure; available and politically convincing evidence of unsatisfied popular demand; and the prevailing social philosophy with respect to child-care. The necessity of an economic limit suggests that universal provision, in the sense of full-day care from birth onwards for the children of all parents who want it, is a very long-term goal, and therefore that priorities must be established in meeting policy objectives. The Working Party urges that when decisions are taken concerning priorities in the allocation of resources, a high place should be given to the provision of good child-care facilities, in order to give all children equal life opportunities and optimum development, and to make it possible for parents to be gainfully employed without undesirable consequences for families.

Every country's decisions concerning provisions are necessarily based on a combination of quantity and quality demand elements, and the challenge to policy-makers, in the absence of cost-benefit data and other information, is how to strike an optimum balance among them while respecting cost limitations. If the quantitative dimension of demand is given too much weight, there is a danger that over-rapid expansion may overburden the supportive capacity of the care system's infrastructure, and quality will suffer as standards are lowered and child-staff ratios increase, to the detriment of the children. The temptation, under pressure from quantitative demand, to expand capacity by straightforward replication of existing institutions and funding formulae may not, furthermore, be the best approach to either allocation of limited resources or the long-term requirements of children, parents or society in general. On the other hand, if quality considerations predominate, the result could be a care system that is able to serve only a small proportion of the families that need the service. The probability that the very best quality provisions would also involve higher costs to parents might also place them out of reach of precisely those population categories most in need of child-care.

Cost considerations are thus a major factor influencing the number, the quality and the variety of services made available. They may determine, for example, a preference for the expansion of family day care over institutional provision, the former being inexpensive to organise and supervise, the latter costly, not only in terms of construction and equipment, but also in terms of operating expenses, particularly for staff. For all categories of programmes, important and complex questions of social and economic policy remain, concerning the analysis of comparative costs, direct and indirect, and the assessment of quality as related to family needs and values, for which clear and consistent measurement criteria have yet to be developed. These questions will need to be answered as soon as possible in order to provide a basis for policy decisions.

Since demand for child-care is expected to continue increasing, while the capacity of public funds to keep pace remains limited, priorities in meeting policy objectives are obviously necessary. But how should they be determined? A first distinction might be made between "real need" and demand pressures arising from changes in social values and behaviour. While each country must identify and define "need", with reference to working parents as well as children, in terms of its own social philosophy and perception of the objectives child-care should serve, it is difficult to pass a judgement on different degrees of need. Children with a special need for care might be considered to include those of single-parent families; of families where both parents are employed or study full-time; of

families in which parents are ill, incapacitated or inadequate; of low-income families; and those with physical, mental or emotional handicaps. All children who do not have adequate care in their homes, whatever the reason may be, should have the benefit of child care. As women have the same right as men to employment, the demand for public child care of a woman with children who has been out of the labour force but who decides to seek employment, also reflects a "real need".

Another set of priorities more related to demand can be distinguished, one stemming from a concern with optimum child development and equal life chances. Highest priority in this category in almost every country is accorded to compensation for various forms of deprivation - economic, social and cultural - due to family background and living conditions. This widespread concern with equalising life chances is evident in the increasing emphasis on special pre-school programmes for these children.

While increasing importance is attached in many countries to the general policy objective of equality of the sexes, priorities accorded in different countries to measures designed to further it in the specific area of child-care depend on two distinct positions. One attaches paramount importance to the mother-child relationship and therefore aims to encourage and ensure the mother's role in the preferred home care of young children by providing economic incentives and limiting the supply of public care facilities to the amount required by cases of obvious need. The other aims to create the conditions that make it possible for both parents to combine gainful employment with family life by providing child care facilities outside the home.

The obvious priorities in connection with the former point of view concern the extension of maternity leaves and benefits, job guarantees, and the provision of adequate allowances or insurance schemes to cover income loss. In response to the latter, while awaiting the realisation of more far-reaching social and economic changes designed to improve working conditions, create a wider choice in the life-long allocation of time and promote more equal sharing of home and family responsibilities between men and women, a first clear priority is the provision of more full-day facilities and/or supplementary after-school programmes. Indeed, if both parents are to be free to take full time employment, the daily hours of operation of care institutions, kindergartens and primary schools must be sufficiently extended and flexible to cover the whole of the working day. Similarly, many additional care alternatives must be made available for school holidays.

A second priority concerns expansion of capacity for children under three to meet not only all cases of so-called obvious need,

but all children whose parents are gainfully employed and who at present must resort to informal, often inadequate, care arrangements. Despite reluctance prompted not only by cost factors but also by division of opinion concerning the appropriateness and possibly negative impact on children of this age group of out-of-home care, greater consideration must be given to the social costs resulting from the absence of adequate care facilities. In addition to expanded capacity, there is also a need for improvement of quality with respect to both staff and programme content, with less emphasis on the purely custodial function and physical welfare and more on child development in the broadest sense.

In conclusion, while further research is undoubtedly necessary to provide policy-makers with information on such matters as costs and benefits of various approaches to child-care, the assessment of quality, the effects of different programmes on children, and the advantages and disadvantages of various models for the family and for society as a whole, a comprehensive framework must first be developed which places child care in its broad social, economic and educational context. Within such a framework, a balance must be sought between quantity and quality; care and education; full-time and part-time facilities; maximum and minimum standards; children's welfare and parents' needs; and provision for different age groups of children. Provision of different types of care arrangement and financial options should be widened in order to give parents a choice between home care and community facilities. Emphasis must be placed on individual services tailored to various needs, in consultation and agreement with parents, who should be better informed of the possibilities available to them.

The achievement of such an approach to child-care clearly involves changes in traditional practices which are increasingly seen as inappropriate, for example, the separation of administrative responsibility for care and education; the lack of co-ordination among related services for health, welfare, care and education; the rigidly differentiated orientation of provision and programmes for different age groups of children; and, in many countries, the overcentralisation of planning and insufficient effort to involve parents and treat the family as a unit within the community.

VI

SOCIAL SECURITY

PROBLEMS AND OBJECTIVES

In industrialised countries, the ways in which social security programmes affect women are as varied as the types of social security systems themselves. In order to limit the types of programmes discussed in this chapter, it is proposed to define in broad terms those to which reference is made.

In this chapter, social security programmes will be taken to include only those programmes established by law, administered by or on behalf of the state, for the purpose of providing, in whole or in part, to citizens or residents and/or their dependents, clearly defined types of benefits either in cash or in the form of services to cope with situations resulting from old age, industrial accident, invalidity, death, unemployment, sickness, maternity, and family responsibilities. They are also applicable to cases of economic deprivation in which individuals or families lack sufficient resources to achieve a minimum standard of living, frequently defined in relation to a fixed subsistence level.

In cash programmes, benefits are made available through a system of insurance; a system of assistance; or by means of universal transfers. These are all included in the definition of social security used here, as well as some non-cash, or service programmes.

Social insurance programmes are for the most part earnings related, eligibility being determined by employment. These programmes are financed in whole or in part from contributions made by employers, workers, or both, and are usually compulsory for specified categories of workers and specified categories of employment. Voluntary affiliation is often available to self-employed persons if they are not included in the compulsory scheme; non-earning members of families may also in rare cases participate on a voluntary basis. Governments frequently participate through direct contribution or subsidies, or by providing administration in part or in whole.

Social assistance programmes are usually contingent on a means or needs test and financed by the general revenues of governments.

In addition to the social insurance and social assistance types

of programmes, a number of countries administer statutory programmes providing universal coverage for persons in specified groups, such as the aged and the chronically ill. The benefits are usually flat-rate and are financed out of general taxation rather than special contributions; such systems may be supplemented by social insurance or social assistance or may substitute for them completely. Sometimes called "demogrant" or "tax-transfer", these systems were usually designed as mechanisms for the purpose of redistributing income and giving purchasing power to a deprived segment of the population by means of a cash benefit.

This chapter focuses first on how to integrate into an earnings-related system women who are not gainfully employed or who cease to be so for fairly long periods in order to devote themselves to unpaid activities in the home; since most social security schemes are based on contributions, they receive substantially lower benefits(1). An equally important focus of the chapter is the set of inequities among different groups in the population which are now built into many social security systems. Particular importance is attached to inequities between one and two-earner couples. To remedy these problems, various proposals are being discussed in certain countries.

Some countries have adopted or are considering programmes which retain the earnings-related nature of social security, but which establish earnings records for all people regardless of marital status and which take into account periods of non-market work as well as work in the labour market.

Service programmes providing defined benefits in the form of services, with or without cash, include medical care, pharmaceutical expenses and hospitalisation. These programmes may be administered directly by the state or by an agency on behalf of the state.

There are many other categories of social security programmes through which similar benefits may be available, but this chapter will discuss only those described above. A thorough analysis and comparative study of the various national social security systems would be impossible here. The purpose of this chapter is to throw light on the main instances of inequality of treatment between men and women for which at least partial solutions have been found in certain countries. The examples given might seem numerous, but the Working Party, wishing to safeguard the document's exchange of information value, decided to keep them as useful illustrations of the diversity and subtleties of the various systems.

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(1) In Australia and New Zealand social security systems are not earnings related and are financed from general revenue rather than by employment based contributions.

Single women who have a continuous career until their retirement do not suffer from inequality of treatment in social security schemes, for they have autonomous rights, unlike non-employed married women who in many countries enjoy derived rights dependent on the contributions paid by their husband. Although these derived rights are generally inferior to autonomous rights, they do not pose grave problems in a continuing marriage but they may become vulnerable if the couple separates or if the husband dies before retirement age. The same applies if gainfully employed women interrupt their employment for relatively long periods to raise a family, during which time their autonomous rights are diminished. Three main factors, discussed below, put women at a disadvantage in the social security system: interruption of employment, change in marital status and, more generally, inequality of employment and earnings differentials between men and women. The influence of these three factors has been reinforced by the rising rate of participation of married women in the labour force and by the change in composition of the female labour force, as detailed in Chapter I.

As this trend occurs in OECD countries women's rights to social security benefits become more autonomous, since in most Member countries contributions are linked with employment. However, many women give up gainful employment for fairly long periods to devote themselves to the care and education of children. During this time, their contributions to the various social insurance schemes are interrupted, and their entitlement to draw benefits in one form or another is correspondingly diminished. In the event of childbirth, illness or accident, no payments are usually made for the period they are away from home, even if they have to engage and pay a housekeeper to replace themselves. Old-age benefits are still in many countries calculated on the basis of years of paid work, and thus are reduced if work is interrupted for a time. As long as benefits are calculated on the basis of lifetime earnings, the achievement of greater equality of benefits for men and women depends primarily on two conditions: first, that of making women's and men's earnings more comparable, and second, that of increasing autonomous rights, notably by shortening the periods of employment interruption and/or ignoring them in calculating benefits.

Inequality of treatment in social security arises in part from the fact that in certain cases it covers the individual who is engaged in a gainful activity and in other cases, it covers the married couple or the family unit. It would be difficult, however, to draw a hard-and-fast line between the two because under maternity insurance, for instance, insured services are provided to all women, whether employed or not. Those carrying on a gainful activity, however, receive their pay in addition, whereas a non-employed

mother only receives an allowance in certain countries. The difficulty arises because earnings related systems have not been able to accommodate the majority of women who are economically dependent part of their lives and earn salaries during the remainder. The ambiguities reflect the multiple goals of systems, which in turn, reflect those of society at large.

Governmental social security programmes may be designed to achieve several sometimes overlapping objectives, among them either to work within the traditional family structure, which involves treating married women as part of a family unit, rather than as individuals or, on the contrary, to treat women as economically independent, and perhaps to alleviate women's family obligations so as to leave them freer to engage in gainful activities and earn entitlements to protection in their own right. In either case, governments may endeavour to utilise social benefits for different ends: maintenance of a vital minimum for the needy, maintenance of employees' income in the event of forced loss of work, or redistribution of income among the various categories of the population, not to mention the demographic objectives of increasing or reducing the birth rate. These different objectives affect the situation of women who have entitlement in their own right or as a derived right, according to how the system is applied. At present, many Member countries are also working within severe cost constraints as demographic projection forecasts a fall in the ratio of population of working age to the non-working population - young, old and handicapped. In the United States, for example, additional special problems contribute to predicted bankruptcy of the social security trust funds. This context of cost will also govern the enactment of reforms which would improve adequacy and equity for women.

With regard to security after retirement, government-sponsored programmes combine more than one purpose. Although different countries emphasise different elements, the same elements are usually present in all programmes. The most important objectives of these programmes are to provide a minimum income for the aged (by an income-tested or universal grants programme), and to provide a public pension programme in which benefits are related to past earnings. Most countries in fact have programmes with both a universal and an insurance, or earnings-related component. That most countries wish to protect all the aged and also to relate retirement income to income earned during the working life raises basic issues of equity for married women either because of their dependency, or because of their low earnings and career interruptions.

Generally, social security systems are not merely insurance systems with contributions calculated as a fixed percentage of earnings but are also instruments for redistributing income in favour

of the poorest categories, and for providing assistance to those in need.

It is often argued that these programmes should emphasise the needs of the different population categories and thus make the social security systems fulfil a number of objectives by adopting different methods suited to each category. The indiscriminate application of the same method of contribution by deduction from earnings to the rich and the poor, the active and non-active dependents, individuals and family units, the healthy and the physically or mentally handicapped, often results in giving to the haves and taking from the have-nots. This paradox is created by the attempt to combine two functions in a hybrid income maintenance system: social insurance and social assistance.

SOURCES OF ENTITLEMENT TO BENEFITS

It is difficult to devise a scheme for paying benefits which successfully combines rights growing out of employment with rights of women who have spent part or all of their lives in unpaid work and who, when they do paid work, receive generally lower earnings. To what extent should couples themselves compensate for these disadvantages of women and to what extent should society at large accept the responsibility?

Problems of equity arise when payroll taxes or insurance contributions finance payments for dependent spouses. Couples with two workers, as well as single men and women, are transferring resources to couples with only one worker. These couples receive double benefits for a single contribution. On the other hand, little attempt has yet been made to estimate the value of the work done within the home by women in the social function of bearing and caring for children. This value would of course vary according to the extent of their family responsibilities. Social security systems (in combination with elements of primary incomes and taxes) determine, by allotting a transfer income or not, who is under an obligation to work in paid employment and who is exempted from this duty. In most countries, it is accepted that it is necessary to provide some form of income for parents of young children, so that one of the parents does not need to work full-time in paid employment. However, political discussions have not yet resulted in a clear-cut line to be drawn as to which families are eligible for those benefits. Even if couples do receive benefits when the children are young, it is necessary to decide whether a parent caring for children at home will still accumulate credits for old-age benefits during this period.

Many women who have a career take some time out of their lives to devote entirely to family responsibilities. In such cases, the cash penalties (in the form of forfeited current income and lower future earnings for the wife) are usually borne jointly by the couple. Because of fewer years in the labour market and lower wages than men, women's lifetime earnings are lower than those of men. There are many reasons for this, only one being that many women do not continue gainful employment during their entire adult lives. These facts give rise to problems when the social security system is based on earnings. When marriage terminates, women may bear the entire penalty for wage inequities and the discontinuous careers unless special provision is made for them.

It is for reasons related to these two issues, of equity between one-earner couples and all workers and of low lifetime earnings of women, that some countries have enacted new social security provisions and other countries are considering various changes. Among these reforms are the following:

1) Eliminating a number of years, related to the number of children, when average lifetime earnings are calculated.

2) Adding credits for the years spent at home to the earnings record. Such a system would raise the following problems:

- At what level should work within the home be valued? At average female wages? At the minimum wage corresponding to the various duties performed during the day, such as domestic, chauffeur, teacher, nurse, etc.?
- Should parents who care for children as well as working in the labour market be eligible, if they receive lower social security credits on their job than if they had stayed at home?
- Should the plan be financed out of payroll taxes? Out of voluntary contributions? Out of a compulsory tax on couples with one earner?
- There is also the problem of whether people who do not work but employ domestics should receive the entire credit - which may be more than the domestic receives for his or her work.

3) Giving divorced persons special rights to a part of their ex-spouse's earnings record.

4) Combining the earnings records of husband and wife for the purpose of computing retirement benefits. If benefits for dependents were then eliminated or reduced, the inequities would be partially redressed. If they were combined with a small universal allowance, they would meet the objective of income maintenance as

well as that of social insurance. One result would be to grant divorced women some rights. Furthermore, such a solution would deal with the problem of discontinuous careers, low wages and dependency. But it is essential that such a programme be formulated carefully so that advantages and disadvantages can be evaluated, for even small changes could disadvantage divorced persons, survivors, dependent spouses or gainfully employed parents. The principles applied in Member countries are diverse and lend themselves with difficulty to generalisation, as the following examples will illustrate.

In Canada, entitlement by own right and derived right has been the subject of an animated discussion, which may usefully be summarised here. It was concerned with giving spouses in the home the right to contribute to the Canada Pension Plan. The principal objection to any form of voluntary contributions to the plan was the inequities it would create vis-à-vis wage-earners and the undermining of its basic earnings-related principles. A number of options were identified by different bodies: to enable spouses working in the home to contribute on a voluntary basis; to split pension credits in case of marriage breakdown; to set up a separate public pension plan for housewives to allow a specified number of years to be dropped from the contributory period if they were spent at home to raise a child. The question of coverage of spouses at home cannot be considered independently of the fact that a universal Old Age Security Programme exists with pensions financed from general revenues for all who meet residence rules. At the meeting of the Federal and Provincial Ministers of Welfare held in Ottawa on 1st-2nd June, 1976, proposals were made for changes in the Canada Pension Plan concerning special provisions for spouses who work in the home. These were that pension credits earned by both spouses during marriage be divided equally between them on marriage dissolution; and that contributors who leave the labour force to raise children should be permitted to drop those years of low or zero earnings from the calculation of their average lifetime earnings for benefit purposes. (This would have the effect of giving some women who work the entire period more credit than those who drop out.) There was unanimous agreement to proceed with the first proposal and all but one province agreed with the second proposal. Legislation will be introduced shortly.

Pension rights are shared between husband and wife in Germany, but only in case of divorce.

In Spain, although the social security system draws its resources from the earnings of the "head of the family" and insures, in addition, dependent persons through derived rights; women who interrupt their employment for a time can obtain entitlement to

social security benefits (including old-age pensions which are then calculated as if there had been no interruption in employment) under special arrangements. Public opinion is, moreover, more and more emphatically in favour of "women in the home" having the right to pay social security contributions and thus be protected in the same way as all workers. The Labour Committee of the Cortes has recently proposed the inclusion of a clause whereby the three years spent looking after each new child would be considered as years of "service".

In the United States, various methods of improving the situation of women married or unmarried and of softening the inequities between one-earner and two-earner couples have been proposed. One is the granting of points to women working in the home while they are off the labour market. The difficulty is to work out the sources and methods of financing such a system. The points system would have the advantage of ensuring continuity of contributions and protecting the specific rights of the married woman, however her marital situation developed. Another scheme widely discussed in the United States would divide earnings credits of husband and wife and create permanent records for both. Dependent and survivor benefits would be eliminated. The disadvantage of this particular scheme is that it would raise benefits of one-earner relative to two-earner couples. This is not necessarily the case with all schemes that divide earnings but is an accident of this particular formulation. The other arrangements considered, such as excluding "non-working" years from the calculation of average incomes or allowing women to pay voluntary contributions while they interrupt employment, are already applied in certain Member countries.

In the United Kingdom, a number of recent major statutes relating to sex discrimination, equal pay, employment protection, social security, pensions and child benefits have introduced important changes with respect to the position of women. Social security contributions are now based on a percentage of earnings and are deducted at source. The benefits under the new system will consist of a basic flat-rate element with an earnings-related supplement. Prior to this, employed married women had a right to opt for reduced insurance contributions, which consequently reduced entitlement to benefits. This is being phased out. From May 1977, gainfully employed women's liability will generally be the same as men's. As a result, women's rights to benefits will be enlarged and fewer wives will be dependent on derived rights. People earning less than the contribution floor, however, as many part-time workers do, are still excluded from both contribution liability and benefit entitlement.

In Finland, all insured persons who carry on a gainful activity are equal in the eyes of the law, and their social security contributions are interrupted if they stop work for whatever reason. Their entitlement to old age or disability insurance is determined exclusively by the actual amounts paid in each year. Besides the system based on employment, every resident is entitled to a basic social security benefit during old age, sickness and disability through the National Pension and Sickness Insurance scheme.

In France too, the social security system is based on the principle of acquired rights linked to earnings, except for certain allowances. This is also the case in Italy where, however, in certain situations it is legally permitted to consider the contributions as having been paid even if this is not the case (maternity benefits, for instance).

New Zealand and Australia form a special case, as social security benefits are financed not by contributions based on earnings but by taxes. This system appears to put women on an equal footing with men, as closely earnings-related contributions and social security benefits (sickness, unemployment and disability) vary according to civil status and level of income. In the Australian and New Zealand systems, the career profile of those who interrupt their employment for certain periods, makes no difference to the level of benefits. Every person, including married women, is insured provided he or she is a resident of the country, his or her income does not exceed the stated maximum, and he or she satisfies the qualifying conditions for the various insurance benefits. Since October 1976, in Australia, it has been made compulsory for all persons to be covered in some form of medical and hospital service programme. As in some other countries, a state administered scheme as well as privately administered schemes operate. Persons have the option of joining either type. Under the State scheme basic coverage for medical and hospital care is provided on either a non-contributory or a contributory basis, in accordance with income ability. More extensive cover under this scheme and under private schemes is on a contributory basis. In this type of system, since social security benefits are granted to those who "need" them (not over and above a certain level of income), married women rarely receive benefits in their own right, or even under "derived rights", thus it is really an example of redistribution of income in favour of the poorest. In New Zealand recent changes allow for reversibility of dependence in respect of social security benefits, except in the case of unemployment benefit,

when a married couple is treated as a single economic unit. When assessing eligibility for benefits, the combined income of the husband and wife is taken into account and if the total income is above, the stated maximum no benefit is payable.

In its two universal schemes covering old age, survivors' and disability pensions, Switzerland is probably the only country in which contributions have no ceiling, as opposed to benefits which, on the contrary, have lower and upper limits. These insurance schemes thus constitute a factor in income redistribution. The optional complementary schemes cover 80 per cent of those in paid employment, but married women are not admitted, or are subject in certain schemes to other conditions than those applied to men in order to be accepted.

In Canada, as in Sweden, every resident is entitled to medical care, a pension and family allowances, irrespective of any gainful activity. Other earnings-linked social insurance schemes supplement this entitlement: complementary old-age insurance, insurance against unemployment and accident at work. The calculation of pensions on a percentage basis, ranging from 95 per cent for the lowest incomes to 60 per cent for the highest, constitutes a means of income redistribution, not counting the income transfer from the active population to the people who carry on no gainful activity.

AREAS OF NEED

The social and economic changes and the expansion in the role of women already described in this report have created new needs affecting social security systems. In some areas, such as employment and family life, modifications may be needed so as not to hamper women in the fulfilment of their wider roles. In others, such as illness, family breakdown and retirement, new ways of guaranteeing security may be required to replace those rendered inadequate by changing circumstances.

Employment

In general, married women experience particular difficulties when trying to return to employment after having interrupted their careers, for example, to devote themselves full time to the care of their children. In many countries they might not be eligible for the various forms of aid which facilitate their reentry into the labour market. The same applies to those who, at a later age, find themselves alone, are obliged, for various reasons, to earn their living, and must look for employment. Generally, this 'tardy unemployment' is recognised neither by unemployment insurance systems

nor by other social security programmes. While in many countries youngsters looking for their first job may register for unemployment insurance, a housewife who tries to reenter the labour market has no financial assistance.

In a number of countries these special circumstances are recognised and certain steps have been taken to resolve the problem. In Germany, any registered job-seeker applying for a job with at least twenty working hours per week is considered to be unemployed, while those leaving vocational school or reaching retirement age are not entitled to unemployment benefits. Subject to certain conditions, widows can obtain retraining allowances. In Canada, a married woman has some protection under unemployment insurance. For example, claimants can draw benefits for a maximum of 51 weeks, depending on their employment record and prevailing economic conditions, providing that they have contributed for at least eight weeks in the last 52 and are available, capable and searching for work. Notice has been given that legislation will be introduced to extend the required weeks of insured employment to twelve. Married women re-entering the labour force are also entitled to employment services such as job information, counselling, training courses provided under Canada Manpower Training, and assistance for job seeking in other areas under the Canada Manpower Mobility Programme.

Some other issues arise in the context of unemployment benefits. In the United Kingdom, for example, among the conditions governing eligibility for unemployment benefits, at least for an initial period, is one that excludes those who leave work voluntarily. Furthermore, benefits may be withdrawn if the beneficiary refuses suitable work. These conditions are difficult to apply to married women in cases where, for example, they leave a job when their husband moves or where, because of their domestic responsibilities, they must restrict the hours or the places in which they are available for gainful employment. Obviously, the administration of this "work test" is crucial in determining the impact on women. The position varies between countries as to whether married women who are entitled to unemployment benefits are also entitled to the allowances for dependent children which their father would get if he were out of work.

In Belgium, women who leave their jobs to look after their children are entitled to unemployment benefit credits for three years from the date of birth, that is to say, unemployment benefits are not paid during this period but acquired rights remain valid when they return to the labour market. The unemployment legislation includes various provisions concerning benefits for part-time or temporary workers, men or women.

In Finland, there are two compensatory systems. Members of

trade unions are entitled to unemployment assistance through unemployment funds. Benefits vary according to wages and the system treats men and women equally. Persons who do not contribute to unemployment funds are entitled to a different system of unemployment assistance financed by the State. This type of assistance is granted only if the family income is below a certain amount.

In France, women who have left their employment to work in the home are not usually treated as unemployed people with a right to the national allowances unless they follow a course of vocational training with a view to re-entering the labour market.

In Germany, periods spent off the labour market can be covered by voluntary contributions to the Old Age Insurance Fund, independently of paid work. Unemployment insurance, however, only applies when the period of previous employment is above a certain minimum; it covers sickness and accident insurance. Periods of unemployment are now taken into account in calculating pensions. It should be noted that "negligible" periods of activity (below the minimum required for entitlement to unemployment benefits) chiefly concern women and involve interruption of contributions to the different social insurance schemes, with all the ensuing consequences. In order to help workers re-enter the labour force, the Federal Institute of Employment has put training programmes and various aids at their disposal. It also pays, since 1st July, 1978, Pension Insurance Contributions in respect of unemployed persons.

In Italy, certain categories of workers - seasonal workers, domestics and people working at home - are not entitled to unemployment benefits; statistics would doubtless show that women are particularly affected by this clause. A special wage agency pays subsidies to industrial workers who are dismissed or partially unemployed for economic reasons. With regard to full-time manual workers, men and women are treated equally and are paid for 80 per cent of the hours not worked (up to 40 hours) for three months, with the possibility of prolonging the period up to twelve months, if justified. During that time they continue to be eligible for sickness insurance.

In Japan, where the majority of women tended to be employed for shorter periods than men they were paid lower allowances. However, the situation was improved under a reform enacted in 1974. Benefits are no longer calculated on the basis of duration of employment, but according to the age of the applicants. Permanent, regular part-time jobs are also covered by unemployment insurance. For temporary auxiliaries, various schemes are being planned for the granting of "daily" allowances, which will be the same for men and women.

In New Zealand, since unemployment insurance is only granted if the household income is below a certain figure, married women, who

are rarely the main family earners, do not often benefit from it, but at the same time, married men whose wives earn more than the maximum amount are not eligible for unemployment benefits either.

In Sweden, when deciding whether a person is entitled to unemployment benefit not only time worked is taken into account but also time spent in state labour market training as well as periods of paid parenthood leave or military service.

Also important in the context of the social security aspects of employment is the question of part-time work, discussed in Chapter IV. Trade unions are concerned that the trend towards increasing part-time employment might undermine negotiated working hours and endanger the legal rights and benefits attached to full-time employment. It was therefore recommended above that part-time employment should be regulated to provide employees with similar prospects, security and benefits as full-time employment, perhaps on a pro rata basis. In certain countries, part-time workers are more expensive for the employer and for this reason risk discriminatory treatment in recruitment.

In Spain, for example, employers pay into the social security funds the same amount for a person who works full-time as for someone who works part-time. In France, only when the contribution reaches the ceiling, the employer might prefer to engage a full-time worker (at the same cost). In Spain, contributions from temporary and part-time workers calculated pro rata count towards the total number of years giving entitlement to a retirement pension. This also applies in Finland, provided that the part-time job has lasted for more than one month with a minimum of twenty hours per week. In the Netherlands, since the national pension is not based on years of service, periods of part-time or temporary work have no effect on the size of the pension. In France, temporary or part-time work carries the right to unemployment benefits, since 520 hours during the twelve months preceding the interruption of work are sufficient to qualify for entitlement. Switzerland has introduced a system which weights the years of part-time work for the calculation of the pension. In the United Kingdom, since February 1977, part-time workers have been able to benefit under certain conditions from the same rights as full-time workers (see Chapter IV).

Family Responsibilities

Social security systems reflect societies' conceptions of the family both in the status they give to family members, for example in the question of derived and autonomous rights discussed above, and in the assistance and benefits given for the performance of family responsibilities, for example through family allowances or special

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payments during interruption of employment for family purposes.

The traditional conception of marriage and the family has changed greatly in many countries over the past decades. The notion of dependence is being challenged. The members of a family wish to be treated as fully-fledged invididuals. This implies that social security clauses should be revised, for they no longer correspond to changing patterns of behaviour. Nowadays, a husband is rarely considered to be the "guardian" of his wife and the custodian of her worldly possessions. Unformalised voluntary cohabitation by independent persons is no longer unusual; this implies that they will contribute to the support of their family according to their respective capacity, by working inside or outside the home. Marriage is no longer an indissoluble contract; divorce is no longer exceptional. Single or divorced women, with or without children, need to be in a position to earn their living and that of their families sometimes with the assistance of single or divorced men who can and should help to support the children. The "household" itself no longer necessarily consists of father, mother and children. The predominant criterion for decisions as to the allocation of responsibility for the children is more frequently based on the best interest of the latter. When divorced women reach retirement age, their pension should be based on their record both before and after the divorce.

Some of these developments are reflected in Finnish law (and also in the new Austrian marriage laws) in which it is enacted that unpaid work in the home, and the money brought into it, are contributions to the support of the family unit. The spouses have an obligation to contribute according to their respective capacities.

If the mother of young children leaves her job to look after her family, she loses certain rights and benefits because this period when she is out of the labour market (though occupied full-time) is not taken into account. Various measures might be proposed to assist parents to carry out their family obligations. One of them, as mentioned in Chapter IV, is to arrange working hours for husband and wife, leaving each more time for the family and children. It is obvious that two people, each working six hours a day, contribute a total of twelve hours to the economy, instead of eight hours put in by one person alone. In several countries, legislation now gives protection to those who leave their jobs temporarily for family reasons. In the United Kingdom, for example, under the new pension scheme a person who interrupts employment to look after children or invalids is awarded 'home responsibility' membership. There is no time limit, but 20 years of contributions from earnings are needed for a full flat-rate pension. (A reduced pension may be payable after less than 20 years' contributions.) Rights to the

earnings-related element do not accumulate during periods of home responsibility. This is not a great disadvantage, however, as the earnings-related part of the pension will be based on the best twenty years of an earning history. Women with home responsibility years in their records will be at a disadvantage more because of lower average earnings while employed, than because they have fewer good years from which to select.

Since a woman not engaged in gainful activity is not regarded as an independent person in most social security systems, her situation is determined by a combination of factors which result in widely different treatment according to whether she is single, married, a mother, 'active' or 'non-active', etc. Her position is also affected by complementary private insurance schemes which often create highly complex situations. A detailed discussion of this problem is available with respect to family allowances and the way in which they facilitate child-care in the six original Member countries of the European Economic Community(1).

If both parents are employed, the child allowances are usually paid by the scheme to which the father belongs, exceptions occurring in the case of separation or when the mother's entitlement to benefits is more favourable for the children. It is clear that different child-allowance schemes have different objectives. The purpose underlying some allowances is to offset child-minding expenses in order to help the mother continue her employment. Some allowance programmes have quite a different underlying aim. Many family allowance programmes were introduced at a time when most married women with children did not enter the labour market unless, of course, those in low income families were obliged to augment the household income. Consequently, the function of the allowance was to augment the income of the single-wage-earner household and permit the mother to devote herself to the home and children.

In some countries the allowance and other features of the social security programmes are designed to make it possible for parents to choose between gainful activity and unpaid work in the home. It is possible that this type of arrangement will permit a better sharing of professional and family activities between the sexes. In practice, however, the size of the benefit (whether allowance or other feature of social security) will have to be substantial to have any impact on labour market behaviour.

In Germany, women can take unpaid leave to look after their children: if the mother has to go into hospital, and there are

(1) Margaret Lisein-Norman: Les Prestations familiales dans l'Europe des Six, Editions de l'Université de Bruxelles, 1974, (see especially Section IV, p. 388).

children under eight or handicapped people dependent on her, she can take on a family helper, the cost of which will be refunded by the social security system. Child allowances can be paid to either parent according to their own decision, since these allowances do not depend on remunerated work. Supplements for children are also provided under the legal old-age, invalidity and accident insurance.

In Belgium, family allowances are mainly drawn from employers' contributions and only to a very small extent from a state subsidy. Contributions and benefits are dependent on the performance of paid work, except for students and handicapped fathers or mothers, whose benefits are fully covered by State funds and, in some cases, mothers who have to give up paid employment to bring up their children. Family allowances are paid to the mother or to the person who actually brings up the child. A special fund established by the National Office for Family Allowances helps to set up institutions to look after children under three. In France, unmarried mothers can deduct from their tax returns a fixed sum for one year's child-minding expenses and can also benefit from a resource adjustment guarantee. An allowance for families headed by single parents is envisaged but the bill has not yet been adopted.

In Switzerland, family allowances at a flat rate fixed by each canton are granted only to persons in paid employment. They are generally financed by the employer with no contribution from the employee. If both parents are employed, the father is generally entitled to the allowances. Tax deductions are granted according to the number of dependent children.

In Spain, family allowances for children of unmarried parents are granted to the father if he has recognised the child, but more generally to the mother. The dependent parents of a single person are also covered by his sickness insurance. Men and women are entitled to special paid leave for marriage (ten days), for travel in the event of death or birth (two or three days) or for moving house (one day).

In Canada, in the Budget address on 25th May, 1976, it was announced that child care deductions under the Income Tax Act would be increased from $500 to $1,000 per child to a maximum deduction per family of $4,000 instead of $2,000. These deductions are claimable if both parents earn or by a single parent who earns, and are in addition to the normal exemption for dependent children which may also be claimed by either parent. The Programme of Family Allowance in Canada does not inhibit a woman in the home from seeking employment in the labour market. Payments are made on a universal basis to families with children under 18 regardless of parental employment. These allowances are normally paid to the mother. In addition, subsidised day care is available on an income tested basis up to a

threshold level of income. Day care programmes are under provincial administration but half the cost is borne by the Federal Government.

In Finland, the tax allowances authorised for children (at local and national level) are granted irrespective of the sex of the "head of the family". If both husband and wife exercise a gainful activity, the higher income is taken into account. In addition, a special allowance equivalent to 20 per cent of the pay of the parent earning least, or of the earnings of a single parent, up to a certain maximum, is authorised to offset the expense of child-minding.

In France, pre- and post-natal allowances are paid to all mothers. Benefits for married women at home are paid to the husband and, if his income does not exceed a certain level, the national family allowance fund makes up the pension contributions of a mother who interrupts her employment to look after one or more very young children; she also receives a bonus equivalent to two years' pension contributions per child brought up. One innovation should be mentioned: the amalgamation of the various social benefits - allowances for single earner families; allowances for child-care expenses - which will constitute a "parental allowance" paid to the household, and no longer chiefly to the father. This represents a step towards autonomy for women with respect to social security.

In Italy, as in most other countries, allowances are paid to the head of family or to his widowed, separated or divorced wife having custody of the children, or to his wife if the husband is permanently incapacitated for work or unemployed. Other measures are at present under study, however, with a view to permitting family allowances to be paid to either husband or wife (or to single persons with dependent children). No compensation or tax allowance is granted for child-minding expenses, chiefly because the day nurseries are free of charge, or almost so.

The position is similar in the Netherlands: fixed amounts are paid to those who support the child financially. Tax allowances for child-minding expenses are not granted in general, but heads of single-parent families are granted a special tax allowance for this purpose if they are employed. The various institutions for child-minding are subsidised by government and local authorities.

In New Zealand, family allowances are paid for every child regardless of the level of income or the marital situation of the parents. Subsidised child-minding facilities, however, are available only to those who lack the means to pay for them.

In Sweden, family allowances are independent of the family's economic situation. Tax allowances for child-minding expenses are not granted because the government and the local authorities subsidise the various care institutions. The new "parents' insurance", aimed at fairer sharing of family responsibilities between

men and women, has improved the position of the latter. The seven months' paid birth leave can be shared between the parents, who receive 90 per cent of their pay during the stoppage of work. A parent who is not gainfully employed receives a benefit based on a guaranteed level. Both parents may not take this leave simultaneously. As the father's wages are generally higher, the family's loss of earnings during the seven months is almost negligible if the parents share the leave. Parental benefits have recently been extended.

For sick children under ten, parents have been entitled since 1974 to a total of ten days' leave per year, paid at the normal sickness rate. This leave can be taken by either the father or the mother. Instead of this sickness benefit (from 1977) a parent is entitled to a parental benefit for temporary care of a child if the parent needs to stay away from the job while, among other things, a child under 10 is sick or the person who ordinarily takes care of the child is sick. The benefit can be taken by the parents up to a joint maximum of 12-18 days per year depending on the number of children in the family.

In most other countries, men have no right to "paternity leave" for the birth or illness of a child. The Finnish Minister of Social Affairs and Health is at present studying a Committee's proposal to share between the parents the 174 working days maternity leave, the 24 working days before confinement and the 75 after it being reserved for the mother, and the father being entitled to 75 days' leave and the corresponding allowances, provided he remains at home.

In Belgium, the National Labour Council expressed the desire, at its meeting on 27th November, 1975 (Opinion N° 505) that all employed persons should be authorised, for imperative family reasons, to be absent from work for not more than ten days a year (consecutive or not), such unpaid leave being treated as working days for the application of social legislation.

In Austria, the present Maternity Protection Law provides for the possibility of extending maternity leave up to twelve months after confinement in order to enable the mother to care for her child during its first year. This period of voluntary maternity leave will not be considered for seniority bonuses, compensation for long working contracts or legal pay-raise, but will count towards retirement. Since January 1961, unemployment insurance will provide cash benefits to a mother following legal maternity leave, up to one year after confinement:

- if she has been gainfully employed and has contributed to unemployment insurance for fifty-two weeks within a period of twenty-four months preceding her first appli-

cation or for twenty weeks during the twelve months preceding her second or further applications;

- if she gives birth prior to her twentieth birthday;
- if she is an apprentice or a student of one of the medical institutions (nurse, medical laboratory technician, dental surgery assistant, etc.);
- if she is on voluntary maternity leave, on condition that she was entitled to a weekly maternity allowance before she or her employer terminated the working contract in consequence of the pregnancy or the confinement;
- provided she takes care of her child in her home.

Since 1974, the cash benefit for mandatory leave has been raised. It is estimated as a lump-sum and is automatically increased. Single mothers receive more than married mothers. Since July 1st, 1976 unemployment insurance has provided cash benefits to adoptive mothers who care for a child during its first year. A sole-support gainfully employed mother may apply for emergency compensation as soon as the child is one year old. This compensation will be paid to her by unemployment insurance for two consecutive years if she can prove that she has nobody to care for the child in her own home.
All mothers are entitled to a confinement grant payable in two instalments. The first is paid after confinement provided the mother has had all required physical examinations performed during pregnancy and on the child the first week after its birth. The remainder is paid as soon as the child is one year old if it has undergone all mandatory physical examinations. Since 1976, adoptive mothers have been eligible for this second instalment. Mothers aged between fifteen and eighteen years will receive the confinement grant personally without written permission of their legal guardian.

In France, the mother continues to receive pay for sixteen weeks and the father is entitled to three days absence for paternity. In Italy, employed mothers receive, apart from maternity benefits, 80 per cent of their pay for two months (or three if the work is arduous or dangerous) before child-birth and up to three months after. This leave may be further prolonged for six months, but with only thirty per cent of their pay. During the first few years they are permitted to take leave when their children are sick. The Inspectorate of Labour can, in certain particularly difficult cases, recommend cessation of work throughout the pregnancy, the worker receiving 80 per cent of her pay during that time. Farmers' wives, shopkeepers and craftswomen, however, receive only the sickness and child-birth allowances, but no pay. Employed women are entitled to take off two hours a day to feed their babies during the first year.

In Switzerland, where sickness and maternity insurance are not on a family basis, the woman is entitled to benefit in her own right but, as sickness insurance contributions are calculated according to the risks involved, women's contributions are ten per cent higher. Length of maternity benefits is ten weeks, of which at least six weeks after the birth. In the United Kingdom, maternity benefits vary according to whether a woman is employed or not. There is a lump sum maternity grant which is paid either on the woman's contribution record or on her husband's but not on both. In addition, but only for the employed woman with a full contribution record in her own right, there are maternity allowances normally paid for 10 weeks and which can be increased in certain cases. In New Zealand, since 1 January 1978, women in the Civil Service have been entitled to an employer financed retrospective lump sum payment equivalent to 30 working days leave on pay, provided they return to duty on or before the expiration of the leave and complete a further six months service. The six months service may be on a full or part-time basis. The Social Security system provides income tested sickness benefits for pregnant single women whereby advanced pregnancy is accepted as an incapacity to work and benefit can be paid from the seventh month of pregnancy up to three months following the birth. Married women are not entitled to receive a sickness benefit by reason of being pregnant. In Canada, new dropout provisions for years of child rearing mean that women who have acquired entitlements to earnings-related disability allowances at the time they leave employment to rear a child will not lose that entitlement even though they are at home rearing their child.

In the United Kingdom, the separation noted earlier between cash payments on the one hand and health and welfare services on the other applies to family benefits. Health services are provided under the National Health Service, while facilities to help mothers with young children such as day nurseries, play groups, etc., are the responsibility of local authorities. With respect to cash allowances, the situation is contradictory and illustrates the problems that may arise in attempting to extend social security for women.
A non-contributory, non-means-tested weekly family allowance for second and subsequent children, payable to the mother, was introduced in 1945. Income tax reliefs granted to taxpayers for each dependent child are separate and, in most cases, are granted to the father. Thus, two systems exist side by side and have given rise to much criticism. Because they are taxable, family allowances are worth most to families with income below the tax threshold. Income tax deductions for dependent children on the other hand, increase in value the higher the income. A merger of both systems in one tax-free cash benefit for every child was proposed. This would have involved abolition of dependent child income tax relief.

Throughout the debates, emphasis was placed on the importance of paying this new allowance by right to the mother. Indeed, this was explicit in the Child Benefit Act of 1971. But it was realised that this provision would have resulted in less take-home pay for fathers because of their loss of tax relief. Consequently, at a time of severe wage restraint, it was decided to postpone introduction of the scheme and to retain separate family allowances and income tax reliefs. The scheme is now being phased in. Meanwhile, there is one new benefit: child interim benefit - a weekly allowance payable to the first or only child in one-parent families. This will only be payable to certain single parents.

In addition to the cash allowances already discussed, there is the Family Income supplement introduced in 1970. Any head of a family, including a single person, who is in full-time employment and has at least one dependent child and a low income, may claim a weekly allowance for each child. Many lone mothers are low wage-earners and previously, if they had children, they were compelled to rely on supplementary benefits which required them not to have full-time employment. Now, because they can receive supplementary benefits in addition to wages, they may enter the labour market. In November, 1974, 55 per cent of all Family Incomes Supplement recipients were lone mothers. The provisions of the supplementary benefits scheme that discriminate against women are currently under review. Difficulties in laying down criteria for considering a husband to be economically dependent on his wife make changes in this direction unlikely.

The United States is a special case, as it does not have a general system of family allowances, though taxpayers may deduct a fixed amount from their taxable income for each dependent and a further amount for child care expenditure. Instead, several different programmes form a highly complex income maintenance system. Under the Social Security System (OASDI), widows or widowers with children under 18 years of age (or children 18-21 years attending college) may receive benefits based on the past earnings of the deceased parent. Each child is entitled to benefits, but benefits to the widow or widower are subject to an earning test. Total payments to a family may not exceed 150 to 188 per cent of the deceased parent's entitlement. Under the Aid to Families with Dependent Children Security Legislation, families headed by a woman or by a disabled or, in some states, unemployed father are eligible for income support payments. Eligibility depends on income and the benefits and conditions vary from State to State. The aged and disabled are also eligible for a federal means tested programme, Supplementary Security Income (SSI), which is also a part of the social security legislation. The Food Stamp programme is a federal programme unrelated to social security which provides vouchers to

purchase food. All families and individuals are eligible, subject to a means test. It is estimated that the benefits have raised the income of recipient families by about ten per cent.

Accident and Illness

Accident insurance protects employees at the place of work and on the way to and from the factory or office. Therefore, parents who stay at home receive no compensation for accidents occurring during their unpaid work caring for their children. There are a few exceptions where sickness insurance covers accidents at home.

In Canada, while compensation is not provided to parents who stay in the home for accidents in which they might be involved, medical and hospital care for the treatment of such accidents is provided through the hospital and medical care insurance programmes which cover the majority of Canadians. In Alberta and Ontario for hospital and medical care, and British Columbia and Quebec for medical care, the entitlement to benefits for persons who stay in the home is a derived right from the premiums or tax paid by the contributor on behalf of the family, but not in the other provinces where no premiums are levied.

In New Zealand, an allowance can be paid as the result of an accident (at home or at work) if a parent has to employ a housekeeping assistant, of if either parent has to give up work because he or she is needed at home.

On the whole, derived rights no longer seem to meet requirements; this is true especially when the conjugal ties are broken, because the woman who stays at home is vulnerable and her dependents usually have no means of support after her death, illness or accident. Provision in case of sickness and disability should include both medical care and income maintenance. In some countries the insurance schemes embrace both of these, but in others, for example, the United Kingdom, the health service provides medical care and has nothing to do with income maintenance. Insured members of the labour force also receive a cash benefit while sick. Most married women are currently not so insured and even when they are, the benefit is not normally supplemented by allowances for dependent children, as is the case for married men. A married woman may be able to receive an allowance for dependent children if her husband is incapable of self-support or if she is not living with him.

Switzerland, Norway and Sweden grant disability allowances to housewives. In Switzerland, they are calculated according to the extent of the housewife's inability to perform her normal activities, i.e. housework, child training and, in some case, a part-time job. The low level of the allowances is due to the absence of contributions.

In the United Kingdom, a new non-contributory invalidity pension was introduced in 1975 - a non-means-tested benefit for people of working age who have been incapable of work for at least 28 weeks but do not satisfy the condition for contributory benefit. At present, married women living with their husbands cannot receive this benefit, but it is soon to be extended to married women who are incapable of work or of performing their normal household duties. This will constitute a "housewives" non-contributory invalidity pension. In Japan, the impairment of physical appearance due to an infirmity is given more serious attention for women than for men.

Married women who stay at home in Austria, Germany, Italy and Spain are covered by their husband's medical care insurance, but not in Switzerland where married women have to contribute independently to a private medical care scheme if they wish to be insured. In Germany, the Netherlands, and probably most other countries, they have no right to any financial compensation if they are not gainfully employed, even for household helpers they may have to take on while they are ill. In Germany, however, household helpers may be provided if hospitalisation can thus be avoided. In some countries, subsidised household helpers are made available in these cases; in the Netherlands, they are free of charge for low-income families.

In Belgium, women at home are not at present entitled to sickness or accident allowances. This situation arises from Article 56 of the Act of 9th August, 1963 which is based on the view that the allowances granted to workers incapacitated for work are intended to make good the loss of earnings. No change can take place in the conditions that determine the granting of allowances until such strict replacement of earnings criteria have been abandoned.

In Denmark, Finland and Sweden the national health services insure married women with no paid occupation, even if their husbands are not insured. The Netherlands, which already has such a scheme for prolonged treatment in medical institutions, is developing a full national scheme of the same type. In many countries uninsured persons can apply for public assistance if their income does not exceed a certain level. In Germany, women can continue to contribute even if they have left their jobs and, in accordance with the new marriage laws, their contributions are considered to form part of the household maintenance.

In the United States, women workers are insured for disability as men are, but must have worked five out of the last ten years to maintain their insurance. Women who withdraw from the labour force for long periods may lose their coverage. For this reason, and because women are not in the very hazardous occupations, only 29 per cent of disabled workers were women in 1975.

In Japan, when an industrial accident does harm to an embryo or fetus as well as its mother, and she needs a termination of pregnancy for medical reasons, the accident insurance system pays the cost of the termination. However, if an accident is injurious only to the embryo or fetus, that system cannot provide any assistance to the woman concerned, even if she has a termination. Moreover, it is prohibited by the Eugenic Protection Law for women to have a termination due to the mere possibility that industrial accident may be injurious to the embryo or fetus. In France, costs of termination may be paid by medical aid but not by social security. Tarification of care and hospitalisation are normalised. In Germany and Sweden the cost of termination and of initiation into methods of contraception are assumed by the sickness insurance scheme. In the Netherlands, the following provisions apply: if termination is carried out on medical grounds (which applies only in a very small number of cases) persons insured under the medical care insurance scheme are fully compensated. The Netherlands Sickness Benefits Act (which makes provision for benefits in cash) grants benefits to employees in the event of incapacity for work, irrespective of its cause. In the United Kingdom terminations are available on certain conditions under the National Health Service. The latter also provides family planning facilities whether those concerned are employed or not. This includes both advice and contraceptives free of charge. Ninety-nine per cent of the population are covered by the general medical care insurance scheme (including hospitalisation) whether single or married, and whether gainfully employed or not.

Living Alone

The number of single-parent families is increasing for many reasons, among them the rising rate of marriage breakdown. Women with and without children who are separated, divorced or cohabiting are treated in different ways under national laws. Inequities emerge when, for example, an older woman becomes divorced after having devoted many years to her home, husband and children and may lose important social security benefits derived from her former husband, eventually receiving only reversion payments calculated pro rata to the years of marriage and the number of children brought up.

Also, women tend to survive their husbands. The problems of widows are often different from those of the divorced. Their pensions often stem from derived rights, and in many systems they are intended to guarantee a minimum maintenance of income for widows with or without children. When the widow is fairly young and has occupational skills she can often continue or resume employment.

If she is older or has interrupted her employment for long periods, however, she will have much more difficulty in acquiring skill and experience and supplementing her often insufficient widow's pension by entering the labour market. Moreover, the possibility of finding a job often depends on her age and the ages of her children.

While single persons of both sexes are equal in the eyes of the law, there is in some systems an element of discrimination in that widowers are not entitled to derived benefits from their former spouses who may have been employed for many years. In other words, derived rights are not necessarily reversible to the male survivor in the same way as to the female survivor.

DIVORCE is generally a financial tragedy when the wife is no longer young, has no occupational qualifications or (the case of 84 per cent in France, for example) has young children to bring up. In many countries she loses social security benefits because she was covered by the former husband's social insurance. If the divorce is pronounced against both parties in certain countries, alimony may be paid only to the children and therefore be very small.

In France, the situation was improved in 1975: the party who initiates divorce proceedings has to pay a lump sum to cover possible health costs incurred by the former spouse. Divorced women not in paid employment have a right to sickness benefits free of charge for one year, or until the last dependent child is three years old.

In the event of the death of her former husband a divorced wife has no right to a widow's pension in most countries but in Belgium, Austria, Germany and Luxembourg, she can apply for one if her former husband dies while he is still paying, or should have been paying, alimony. Certain countries, such as Switzerland, add the further condition of a minimum duration of marriage or an incapacity for work. In the Netherlands, the former wife is entitled to a widow's pension without such restriction. Austria and Spain continue to provide a widow's pension both for the former wife and for the present wife of the insured husband.

In the United Kingdom, a divorcee whose former husband dies cannot get widow's benefits. If she does not remarry before the age of 60 and does not have sufficient contributions of her own for a retirement pension for the years when she was married, she can make use of the contributions paid by her former husband before the marriage was terminated. If she is 60 or over when the marriage ends, she can on the basis of her ex-husband's contributions, qualify for a retirement pension, equal to the one she would have received had the husband died on the date the marriage was dissolved. A women who remarries before the age of 60 loses the above possibilities and any subsequent benefits are related to the second husband's

contribution record. A divorced woman who has a child towards whose support her former husband was contributing, or should have been contributing, may on his death claim a special child allowance based on the former husband's contribution record. There are special provisions to help a divorced woman qualify for sickness or unemployment benefit during the period following her divorce if she cannot satisfy the ordinary contribution conditions.

In Switzerland, the old age pension for a divorcee is calculated on the basis of her own earnings. However, if her husband is deceased, if the couple had one or two children at the time of the divorce, or if the wife was at least 45, the old age pension is calculated on the basis of the couple's income. In Germany, a widow's pension is granted to a divorced wife only if she was entitled to maintenance payment from her previous spouse or if such payments were actually made. The widow's pensions are, as in France, calculated pro-rata to the years of marriage, but only if the deceased husband leaves a divorced wife and a widow. A legislative reform has improved the situation of divorced women who will henceforth share the acquired entitlement to disability and old-age benefits in proportion to the duration of the marriage. In France, widows and divorcees can cumulate for two years the widow's pension and the mother-at-home, orphan's and child-minding allowances.

The Federal Government of Canada proposed (Conference of Welfare Ministers, June 1976), and legislation will be introduced shortly, to split Canada Pension Plan pension credits earned by both spouses during marriage equally between the spouses on divorce or annulment. At present, if the divorced wife has not paid contributions she is not entitled to a survivor's pension. The problem of single women who are family supporters is particularly important in Canada: there were 370,825 in 1971, 43 per cent of whom were in gainful employment. A system of supplementary financial aid is under study, not especially for single women but for all low income people who can qualify.

In Spain, when the divorce is pronounced in their favour, divorced women and their children continue to benefit under the former husband's insurance.

In Finland, in the event of dissolution of the marriage, the obligation to provide for the needs of the children is shared between the spouses, although the children are usually entrusted to the mother. If one or other of the spouses finds it impossible to meet his or her obligation the State participates up to a certain sum per month. Illegitimate children are at a disadvantage compared with the children of divorced couples. In this connection, a legislative reform is to be introduced to ensure that lone heads of families whether widowed, divorced or single, are treated in the same way.

In Italy, the pensions are divided proportionately between the current spouse and the former spouses in favour of whom divorce was pronounced.

In New Zealand, generally speaking, if they have children or other dependents either spouse may, after the death of the other, receive the social security allowances; but in the event of dissolution of the marriage or separation (for imprisonment, mental illness, etc.) a lone woman with no children may in certain conditions receive the social security benefits solely on the basis of her previous status as a housewife.

In the United States, a divorced woman is entitled to benefits deriving from her husband's record as follows:

1) provided that the marriage has lasted for at least 20 years, she receives on her ex-husband's retirement the same proportion of the pension as a current wife. This is often not enough to live on. The situation changes when the ex-husband dies, as a divorced widow's pension is much higher. On the other hand, divorced women whose marriages have lasted for less than 20 years are left without rights based on their husband's records and may have little time left to acquire new rights. Their benefits accordingly may be very low. They are eligible when they reach the age of 65, for the means-tested programme for the elderly, Supplemental Security Income, or, when 60, for a widow's pension based on their husband's record;

2) if she has not been married 20 years, but if her husband dies and she has dependent children in her care, she is entitled to the same benefit as a widowed mother.

The conditions of eligibility for SURVIVORS benefits also vary greatly among Member countries, with age, capacity for employment, length of marriage and sex being taken into account in some but not in others. The age requirements for drawing widows' benefits, for example, range from 35 to 36 years in Canada, Portugal and Sweden, to 40 years in Finland and the Netherlands, 55 years in France and Denmark and 60 years in the United States when there are no children; the age for drawing benefits for widows with children is not specified but depends on the age and dependency status of the children.

As long ago as 1948, Austria greatly improved the situation of widows by doing away with the conditions relating to age or incapacitation for work which had to be fulfilled to benefit from the widow's pension in many other countries. In the United Kingdom there is no age requirement for the widow's allowance (a resettlement allowance paid during the first 26 weeks of widowhood) or the widowed mother's allowance (payable when the widow has a qualifying child in her family). For the widow's pension, which may follow

either of these benefits, the widow must be 40 or over when the earlier benefit ceases.

In Switzerland, no age condition applies to widows with children, and incapacity for work is not a condition. Married women and widows with no gainful activity are exempt from contributions to the national old age and disability insurance system, though they are covered by it. The widow's pension is calculated on the basis of the average mean income for the couple, or the wife's average income if this is higher. The number of times widows have been married is of little importance; two or three pensions can be paid in full, provided that each marriage lasted at least ten years and that the divorcees were awarded alimony. However, for childless widows, their age and the duration of their marriage are important. In other countries too the widow must have reached a certain age, or may have to prove her inability to work.

In the United States, a widow who meets the age qualification can receive the entire amount of her husband's pension, or her own retirement benefit, whichever is higher. Further, a widow with a dependent (under 18 or disabled) child in her care also receives benefits. A widow who is disabled can receive benefits at the age of 50. Without children or disability, no benefits can be received until the age of 60.

In Canada, a full survivor's pension is paid to widows or widowers of contributors if they have dependent children or are disabled. Survivors' benefits paid to spouses aged 35-45 who are not disabled or do not have dependent children are reduced. Survivors aged 65 or over may combine this benefit with any retirement pension payable.

In Germany, recipients of a survivor's pension, in general, are exempt from sickness insurance contributions although they continue to be covered. If the death occurs before the completion of the statutory period entitling them to a pension, widows or divorcees can voluntarily join the social insurance scheme.

In Belgium, the widow of an employee or retired worker continues to receive family allowances for the children living with her at the time of the husband's death: the allowances are increased for orphans but revert to the normal rate if the widow (or widower) sets up house with another partner.

In Japan, elderly widows can obtain larger pensions under the Employer's Pension Insurance System, but not under the system for self-employed workers. Under the workers' accident compensation insurance system a widow is eligible to receive a survivor's pension regardless of her age or degree of invalidity at the time of her husband's death.

As a general rule, if death results from an accident at work,

in addition to her pension the widow receives lump-sum compensation corresponding to several months wages.

In Finland, on the death of either parent, the children receive an allowance but the widow's pension is much higher than the orphan's. This corresponds to the usual pattern which depends mainly on the father's income, even though in most Finnish families both the father and the mother are employed. One peculiarity is worthy of note: apart from the widow's pension and orphans' allowances the widow, as a lone mother, receives more social benefits than an unmarried mother.

In the United Kingdom, there will be changes under the new legislation. At present, a widow's allowance based on the husband's contributions is payable for the first 26 weeks of widowhood. When there are dependent children, this is followed by an allowance for the widowed mother. When the husband's contributions have only been partial, reduced rates may leave a woman with a small allowance. If she has no dependent children, a widow's pension is paid only if she was at least 40 when her husband died or if she is that age when her widowed mother's allowance ceases. If a widow remarries or cohabits, her widow's benefit stops. The widow's pension is partly flat-rate and partly earnings-related; the latter will become increasingly important under the 1975 legislation. Similarly, in Sweden, and in most countries, the concept of dependence operates in respect of widow's pensions which are lost on remarriage. Consequently, it is not uncommon for widows to live with another man but avoid remarrying because that would deprive them of their widow's pension. However, regulations governing cohabitation exist in many countries though they are the object of increasing criticism.

REVERSIBILITY of pension rights between wives and husbands is not mutual in most countries. That is to say, an employed woman who earns a pension by her own contributions cannot be sure that her husband will benefit from it in the case of her death except on certain conditions. In this respect, women who have undertaken gainful employment lose one of the advantages of their work. Widower's pensions are rare in both state and occupational schemes, the United States and Canada being the main exceptions. Sometimes, schemes have simply no provision for widowers; more often, the conditions of eligibility exclude men except under special conditions, such as age or disability.

In Canada, since January 1975, no difference has been made whether the beneficiaries of the insured party are male or female. In Japan, under the Employer's Pension Insurance System and the Workmens' Accident Compensation Insurance System, a survivor's benefit is granted to a man if he is over 60 and has been supported wholly or partially by his deceased wife. In Germany, a widower's

pension is granted to a man if it is recognised that his wife was the "breadwinner", but new regulations are projected for 1984 at the request of the Federal Constitutional Court. New legislation in the United Kingdom allows for widowers' pensions in cases where the husband has been incapable of work. It also provides for widowers to inherit their deceased wife's earnings-related pension and, in a few cases, the whole pension.

In Sweden, as in most countries, the widower receives no pension unless his wife was recognised as the principal earner or if he is disabled; however, children who lose their mother qualify for higher allowances as compensation for the widower, even if he receives no pension. In Switzerland, if the widower is afflicted with a permanent incapacity for work within five years of the death of the insured wife, he is entitled to a pension.

In New Zealand, widowers and widows receive social insurance benefits if they have at least one dependent child. On the other hand, a childless widow, but not a childless widower, may qualify for a benefit if she satisfies certain age conditions (40 to 50) and has been married for a certain time (5 to 15 years) as the case may be.

In the United States a recent Supreme Court Decision eliminates language in the present law under which a man has to prove that he is "dependent". Beneficiaries in their own right cannot, in fact, cumulate social security entitlements in both their own right and by derived rights; they can only receive the higher of the two.

But, in general, the unfairness inherent in "dependency" is more frequently experienced by women; on the one hand, women who have remained in the home are often awarded inadequate resources and, on the other hand, single and married women who work are not entitled to the same social insurance benefits as their married male colleagues with a wife with no earnings, even though they have made similar contributions. Certain supplementary schemes (in Belgium, for example) grant a survivor's pension to widowers. In the United States, it is pointed out that women may also have dependents and survivors: half a million people receive allowances under working women's insurance entitlement. This entitlement goes mainly to children, in fact covering one child out of every ten.

Retirement

Generally, married women of retirement age are paid a small "derived pension", and often a widow's pension. This may be paid for a long time as womens' life expectancy is greater than men's. Unequal treatment often arises because the statutory age for retirement is different for men and women in most countries, though not in the United States. One might suppose that, since women are able

to draw their pension three to five years earlier than men(1), they have an advantage; but their average pension is often much smaller because it is based on lower earnings, and on a shorter total period of career activity because of career interruptions. In Canada in 1972, for example, the average earnings of men contributing to the Canada Pension Plan were more than double those of women ($7,769 against $3,655) and only four per cent of women pensioners received the maximum pension. Pensions based on a scale ranging from 100 to 143 maximum were paid to 80 per cent of men, as against 51 per cent of women. In Finland, in 1973, the 71,057 retired men received on average Fmk 263 as against Fmk 141 for the 55,478 retired women. To counterbalance these shortfalls and ensure that they do not unduly affect the female population, the Expert Commission of the International Labour Organisation(2) has proposed various measures such as that:

- length of career should no longer be taken into account or it should be possible to make up missing years of contribution;
- minimum pension rates should be fixed;
- the methods of calculation chosen should be more favourable to low wage-earners;
- periods devoted to home management should be taken into account; and
- a bonus should be awarded for each child brought up.

This problem of low pensions arising from shorter careers and lower earnings has drawn a number of responses from Member countries. In Australia, old-age benefits are not calculated on years of paid work. They are paid to women at the age of 60 and to men at the age of 65, and are subject to an income test up to 70 years of age when coverage becomes universal. While women receive benefits earlier than men, they are often required to retire earlier. They may then be disadvantaged in that they must depend on social security for a longer period of time than men. Married couples receive a combined benefit which is less than that received by any two single people, even those residing together. This creates inequities for married people, as they have a derived right to a benefit which is less than that received by a single pensioner. A

(1) The age entitling women to a pension varies in Member countries between 60 and 65 years and the age for early retirement between 55 and 65 years.

(2) ILO, Expert Commission on Social Security: Questions of Social Security concerning Women (26th November-3rd December, 1975), p. 27 mimeographed document.

married woman may receive the single rate until her husband reaches pensionable age when her benefit immediately decreases to half the benefit payable to a married couple. In Austria, the retirement age for the ordinary pension is 60, and for the early retirement pension

Women also have the right to draw an old-age pension and a widow's pension at the same time and in addition to those pensions to earn supplementary income in paid employment, but the income from paid employment can mean suspension of part of the pensions. In Germany, only women can retire as early as 60. Early retirement at 60 is, under certain conditions, possible for unemployed. Starting from 1980, this will also apply to severely disabled persons. In 1972. Germany introduced a reform helpful to women, basing the calculation of the pension on a national "minimum wage", representing 75 per cent of all incomes insured. However, this is used as a basis of computation only for past periods of employment. Its introduction, however, raised the pensions of about 1 million women.

In Belgium, single persons receive a pension equal to 60 per cent of their earnings; for a married man whose wife has no pension, the amount is increased to 75 per cent. The latter rate does not apply to a married woman with a dependent husband. Exceptions are made, however, under the miners' pension and disability scheme, whereby single persons with one or more dependent children under 16 are entitled to 75 per cent of their former earnings. Since the pension is largely based on the recipient's professional career, a woman who gives up employment for a certain number of years has a corresponding cut in her pension; but she has the option of continuing to pay contributions during that time, provided she pays the employer's contributions as well.

In Switzerland, married women receive old age benefits as early as 60 if their husbands have reached the age of 65, and single women as early as 62. Pensioners can continue to carry on a gainful activity without reduction of their old age pension.

In Canada, all persons aged 65 and over who meet the residence requirements are entitled to an old age security pension "demogrant". Pensioners with an income below a specified level are also entitled to a benefit called the Guaranteed Income Supplement. Under an amendment to the Old Age Security Act, a tax-exempt "spouse's allowance" has been introduced to benefit husbands or wives (between the ages of 60-64) of pensioners whose income is below a certain threshold.

In the United States, the minimum retirement age has now been fixed at 62 for both sexes. Women are more inclined to retire when they reach the age of 62 and thus receive an actuarially reduced pension (which is augmented by "derived" supplements in some cases); 63 per cent of women receive reduced pensions before the age of 65

as compared with 44 per cent of men. Furthermore, as is probably the same in other countries, private supplementary pension schemes aggravate the difference between old age income for men and women, firstly because women do not work in the union-dominated sectors that offer such schemes; and secondly, because as many women interrupt their careers and do not stay long enough with the same employer, they cannot qualify for such insurance. (In 1969 only 23 per cent of women were covered by private pensions compared with 52 per cent of men.) The timing of earnings as well as the number of years worked affect the pensions. Inflation is responsible for the fact that 20 years of earnings earned at the beginning of a career is not worth as much as 20 years of earnings earned at the end. Index-linked earnings are being considered for the computation of benefits to eliminate this difficulty. For these reasons, at the end of 1975, the average pension for a woman was $181,80 (see Table 17) and for a man $227,25; women's average benefits correspond to 80 per cent of those of men. In 1970, the median rate of replacement (social security benefit divided by the average monthly earnings) was 59 per cent for women and 44 per cent for men, since the pension scheme replaces a higher proportion of low than of high earnings. In addition, women live longer, which increases the total benefits they receive. A married woman is entitled to a dependent's allowance whether or not she is employed. If she is, she may not have both the worker and the dependent's allowance but only the higher of the two. The gainfully employed married woman may thus receive little more in the way of benefits than the wife who never took a paid job.

Table 17

SOCIAL SECURITY BENEFITS PAID TO RETIRED AND DISABLED WORKERS, BY SEX, IN DECEMBER 1975 (U.S.A.)

Type of Benefit	Recipients of Current Benefits (1000)		Average Monthly Amount (Dollars)	
	Women	Men	Women	Men
Retired workers	7,400	9,156	181,80	227,75
Full benefit	2,497	4,691	206,98	247,42
Reduced benefit (applied for before the age of 65)	4,903	4,465	169,46	207,34
Disabled workers	778	1,711	185,34	244,32

In Austria, Canada, Germany, the Netherlands and Spain, widows have the right to cumulate earnings, retirement pensions and widow's pensions. In Canada, when widows or widowers are between 35 and 45 years old, are acknowledged to be capable of work and have no dependent children in their care, survivor's pensions are subject to reduction. Pensions are not paid if the potential beneficiary is under 35, but are deferred until the widow or widower reaches the age of 65. In Switzerland, the widow's pension is automatically cut off when she reaches the age of 62, which entitles her to an old age pension in her own right. In Finland, old age and sickness insurance applies to all residents, men and women, active or non-active. As in many other countries, men have no claim to a widower's pension unless they are entirely dependent on their wives; if the wife gives up paid employment, however, the amount of the husband's old age pension is increased.

In the Netherlands, the pension for both husband and wife is paid when the husband reaches the age of 65 (100 per cent of the minimum guaranteed income: single persons receive only 70 per cent). It is possible, on request, to pay 50 per cent of the pension to the husband and 50 per cent to the wife. This national pension scheme covers the whole population and full pensions are paid irrespective of the length of the career. This is not the case for private pension funds.

In Sweden, those who have had a short career, as is the case for many women, are favoured by the fact that three years' work suffices to obtain a pension and 30 years to attain the maximum. Moreover, the time elapsing between the date of retirement and the statutory pensionable age continues to count as an earning period. There is a basic old age pension for all residents, to which is added the supplementary earnings related pension.

Whether they have carried on a gainful activity or not, married women in Switzerland are not entitled to an old age pension in their own right; they contribute to the pension for the couple and can apply for half of it to be paid to them.

In the United Kingdom, the Social Security Pensions Act of 1975 introduced a number of changes affecting the position of women. When the new scheme becomes fully operative (gradually over 20 years), the retirement pension will have two components: a basic flat-rate sum and an additional sum calculated on the contributor's twenty best years of earnings. Men and women with the same earnings record will receive the same pension. If both husband and wife qualify for the pension on their own contributions both pensions are payable. If only the husband qualifies, he can receive a flat-rate pension plus a dependent wife's allowance, and also the additional sum based on his earnings. If the wife is entitled to a flat-rate

pension at a reduced rate that is less than the dependent wife's allowance, her husband's contributions can be used to 'top up' her flat-rate pension to the level of the dependent wife's allowance. She can then draw that amount of flat-rate pension plus an additional sum based on her earnings. A married woman's "half test", which requires that to qualify for a pension a woman must have paid or been credited with contributions for at least half her married life, will be abolished in 1979. In addition, there will be a new provision in favour of women who have periodically given up employment on account of home responsibilities. Provided a woman has paid or been credited with contributions for at least 20 years, any other year during which she was precluded from regular employment by home responsibility may be counted as a "reckonable year" for retirement pension purposes. At present, and during much of the transitional period, the prevailing situation of women reaching retirement age is likely to continue. Many married women rely on their husband's insurance, which provides a pension for a dependent wife (60 per cent of the husband's flat rate pension) and a widow's pension after his death. But the total amount is often insufficient and therefore a supplementary (means-tested) pension has to be obtained. At the beginning of 1974, 26 per cent of all retirement pensioners were receiving supplementary pensions. Elderly, widowed or single women are in a particularly vulnerable position and at present constitute a high proportion of those receiving supplementary pensions.

ADAPTING TO NEW NEEDS

In industrialised countries, social security systems were established at a time when women's, and particularly married women's, participation in the labour market was much lower than today's. The social and economic circumstances affecting women are now quite different from those prevailing when public policies for providing social security protection were originally developed. In some countries more than half the working age women are now actively engaged in paid work. There has also been a major change in the nature of the family which in the past provided some protection to family members and consequently contributed to the security goals of social security systems. Women's and men's attitudes to their role in the family and their role in society have also changed. All these developments have created pressure to reform existing policies and programmes. The various solutions presented hereunder are placed side by side as possible alternatives and no value judgment is given as to the preference of one or another of these solutions.

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The following issues in particular have been raised:

(1) Earnings-related protection for women workers has grown with their labour force participation. Since women's wages are lower than men's and since many women have much shorter careers, their benefit levels are, generally, at a lower level though benefits continue longer because of the generally longer lives of women. Thus, if they must rely on benefits based on their own earnings, especially if their marriages terminated through divorce or widowhood, women suffer financially in the following ways:

- Pensions are often inadequate (as they are for low-earning men);
- Unemployment insurance sometimes does not cover women reentering the labour force or women who must restrict their work for family reasons;
- Disability and sickness protection often does not cover women at home.

(2) There seems to be a growing view that given the social reality in most countries it is inadequate that many women should continue to derive their rights from their husbands. Removing this dependency is particularly difficult, however, in systems which make benefit allowance dependent mainly on earnings.

(3) Inequities arise between earning and non-earning women, and between one-earner and two-earner couples when protection for dependents based on marital status has grown alongside protection based on work and protection based on need. As a result, in some cases the social security system results in a redistribution of income from persons with a low income to those with a higher. Thus a system based on a family structure in which one of the spouses remained at home, which might have been equitable in its time, may now be inequitable given the wider variety of roles for women in society.

The review of the effect of social security systems on women has shown the complexity of the basic philosophy underlying the design of the systems, partially because most systems attempt to achieve several and sometimes overlapping objectives. It is therefore difficult to make specific recommendations which are both equitable and applicable to systems which vary greatly among countries. Because social security systems have developed over several decades in response to different needs and social pressures, each country will design changes in its system in accordance with its own requirements.

Member countries have dealt with these issues of inadequacy, inequality and dependency in varying ways and at varying speeds

because of these different philosophies. A wide spectrum of approaches and combinations of approaches has been tried or is under consideration. Some of these are described below, with a summary of their advantages and difficulties.

NEEDS-BASED and INSURANCE systems: some Member countries have systems which rely heavily on a needs-based philosophy while others are characterised by the insurance approach. Several countries have developed systems that incorporate elements of both, with one 'track' or component designed to ensure a minimum level of basic needs and the other track based on the insurance approach. In practice most systems represent a combination of approaches. Even those with a heavily insurance-based system have some component of their social security system based on need and financed out of general revenue. Some favour enlarging this component so as to give autonomous rights to benefits to many now covered only by derived rights. One of the major advantages claimed for this approach is that the administration of the programme is much simpler and the benefits accrue to those in greatest need. In practice, however, there are difficult issues involved in the design of such a system. For example, a particular difficulty is in setting the level high enough to meet the needs of those who are not employed without discriminating against those who are. The major disadvantage is that a means test, necessary under such programmes, is often thought demeaning, and thus the benefits are not always taken advantage of by those in need. There have, however, been a number of proposals to avoid this particular disadvantage by linking the benefits with the income tax system. Nevertheless, in some countries, avoidance of a means test is extremely important to the philosophy of social security; income-tested programmes provide low benefits and can supplement but not replace insurance programmes.

Implicit or explicit VALUATION AND CREDIT OF UNPAID WORK have already been incorporated into the earnings-related systems of some Member countries. Parental responsibility membership or credit may be given, and/or years spent out of the labour force not counted in averaging earnings for pension credits. These methods, of course, value the time spent in bringing up children at the average earnings of the worker for the period when he or she is in the labour force.

To exclude non-earning years from the calculation of average incomes establishing the right to allowances, or alternatively to specify a value for these years, will potentially affect the average level of income of women used to calculate their level of benefits. But when women are young and stop working their wages are still at the bottom of the scale; if they interrupt their careers for ten or fifteen years, they cannot claim a high wage

when they return to the labour market. Women's average income generally remains low due to the combined effects of many factors, including their few professional qualifications, their concentration in so-called women's careers (less well paid because they are lower in the professional scale) and, especially, interruption of employment activities. By counting the equivalent of an individual's average earnings the years of absence from the work force, the effect of women's interrupted work patterns on allowances would certainly be attenuated. The lower level of women's earnings would remain.

The idea of excluding non-earnings years, though attractive, raises important questions of equity vis-à-vis people who have made the same total contributions but different timing of earnings.

Some countries are discussing the possibility of explicit valuation of unpaid work either through some average wage or by measuring the economic value of household work. The implications of developing the latter valuation system are far reaching. It could involve the issue of the measurement of the Gross National Product. A number of countries have studied proposals to improve the value of GNP as a measure of the output of goods and services. As part of this some countries have already experimented with estimating the economic value of household services.

Either an explicit or an implicit scheme would have the advantage of insuring continuity of contributions and protecting the specific rights of the married woman, however her marital situation developed. An explicit credit would have the further advantage of giving credit for work which at present enters the national accounts in a most inconsistent manner, i.e. only when it is performed by a domestic.

The problems and issues raised by valuation proposals include:

- Kinds of work covered. Different kinds of unpaid work might be covered. Child care, at a small number of years per child, any housework at all, care of an adult dependent, or even education, training, or unemployment are some of the possibilities. Such a plan should not be confined to women.

- Computation of explicit credit. Should the labour be valued at average wages? At the average wages for the particular workers? At the wage, average or minimum, for the type of work performed, such as chauffeur, teacher, nurse, etc.?

- Problems of financing. The financial implications of the valuation of non-remunerated work are also formidable: there are, of course, a number of possible approaches. One is simply to provide the women not engaged in paid work with individual rights to social security and require no additional contribution from the individual or the other individuals in the household who are in paid work.

Alternatively, the additional financing costs may be borne by each household and the financing would in this case reduce disposable income of the household unit. The financing arrangements selected for the valuation of unpaid work would naturally be influenced by the actual additional cost of this change in the programme. One of the difficulties in determining the financing arrangements is that under most earnings based systems the employer also contributes to the cost of financing social security. It is clearly not desirable to finance any additional costs for a programme which confers individual rights to social security through an additional contribution from the employer of one of the members of the household. If the employer has to contribute to the additional costs of conferring individual rights to the dependents of one of his employees, this will certainly affect his future hiring practices. Because of the complexities of the valuation system a number of countries have made changes in their system which, while not explicitly developing valuation systems, have made it possible to permit those who are not currently employed to contribute, i.e., buy into the social security system. A disadvantage of compulsory financing by the people receiving the credit is that these additional tax burdens probably come at a time when the couple is already living on a restricted income, after the wife has withdrawn from the labour force. A disadvantage of voluntary contributions or buying in is that the poor would not have the incentive to give up current income for future benefits since they will be covered by the non-earnings related benefits.

Some Member countries use the approach of the UNIVERSAL GRANT not based on need. They use it to a limited extent, however, and rarely to cover all social needs, which would mean a very large grant for everyone and be an inefficient use of resources, as very wealthy as well as the very needy would have to be covered. To avoid this, such a grant is usually taxable on a progressive basis.

Some Member countries have tried, and others are discussing, plans to award pension and other social security rights according to the TOTAL EARNINGS RECORD OF BOTH SPOUSES. This plan has the advantage that no extra financing is needed, and that it establishes a record for both spouses which continue no matter what happens to the marriage. Great care in formulation of such plans is needed, for small variations can cause new inequities.

Certain of the above proposals could give rise to equity problems. In some countries, only those with substantial work records are eligible for parental responsibility credits or the equivalent. Under some proposals, anyone, even someone who has never been employed, would be eligible. The costs would be borne (except under the buy-in scheme) by all workers. This might result in a perverse

income transfer. Another equity issue occurs between those who take advantage of the credit scheme to leave the market, and those who continue to work for pay, while at the same time managing a household, and perhaps receiving low wages and thus low credits. This problem should be resolved before such a plan is tried.

These plans, which derive women's benefits independently of their husband for some purposes, such as unemployment or old age, may or may not carry with them some family based benefits such as maternity or widowhood. Some plans under consideration, for example, in the United States, would derive benefits for each member of a couple by splitting combined earnings, but a survivor would receive two-thirds of the total family benefits. Different Member countries have various systems for computing widows' benefits which do not necessarily follow from their systems for deriving other benefits.

All the above plans have in common that they address the issues raised: dependency and adequacy. They establish a record, upon which earnings-related benefits can be based, or they pay benefits without a record, in the case of universal programmes, but in any case marital status is not a material condition for payment of benefits under these plans. They are not all equally effective in dealing with the equity issues. Some formulations transfer resources in perverse ways. It is important to ensure that in solving some problems new inequities are not introduced.

An important constraint on any plan is the cost. All Member countries are faced with rising ratios of retired to employed persons as the fertility rates drop. All social security programmes must deal with these facts, with which cost projections must be kept in line. There is also concern for effect of tax burden on work incentives.

One study analyses costs and benefits to the individual of various plans. These plans include prototypes of those mentioned above compared with a "basic" plan. Five Member countries served as models for these prototypes. The study compares present value of costs and benefits, and average monthly benefits for various groups: high, middle, and low income groups (vertical equity) and men and women with different work histories and marital status (horizontal equity). This kind of work is very promising for policy makers, and it is hoped that more study of this type of total costs and distributional effects, will be undertaken(1).

The treatment of women in social security systems is clearly at the centre of these equity issues. Changes in participation

(1) Nancy M. Gordon, "The Urban Institute", May 1977, unpublished, in process.

rates of women mean that the proportion of women in unpaid work is declining. Despite this trend, under many systems there will continue to be a substantial proportion of women who will continue to "derive" their rights from their spouse.

Finally, social security systems must be coordinated with other elements of social policy. Since some of the social pressure for reform of social security programmes has emerged because of changes in the role of women in society, many aspects of the need for coordination with other social policies are self-evident. Nevertheless, it is worth emphasising that governments cannot initiate changes by providing equal opportunity in education and employment, for example, without recognizing that this will affect the nature of change required in social security. If governments take action to encourage the continued rise in labour force participation rate of women, and their particular social security system is heavily based on the insurance concept, this will reduce the nature and magnitude of the problem of non-remunerated work. Any policy changes affecting the treatment of non-remunerated work will have to take into account the impact on labour force participation rates. Similarly, any government programmes which increase the provision of child care and early childhood education should be coordinated with the family allowance features of the social security systems.

This review has shown that the equity issue is complex. Potential solutions to the problem for one category of women may raise equity issues for other groups in society. In addition, even when it is fairly certain that change should be in a particular direction, cost constraints may restrict or retard governments' ability to implement rapid change. The information from Member countries has, however, confirmed the view that the basic principles underlying the eligibility requirements, benefit structure and financing arrangements of many social security systems must be reexamined if the system is going to provide equity for women, as well as other groups, in their varied lifetime roles.

VII

CONCLUSIONS AND POLICY DIRECTIONS

THE CHANGING POSITION OF WOMEN IN THE LABOUR MARKET

For several decades a transformation in the economic role of women has been taking place with growing speed. Their participation in the labour market has greatly increased, and in many countries has continued to increase in spite of the recession. Particularly noteworthy is the growing tendency of married women with children to continue gainful employment or return to it after only a brief interval, and of older women to return to the labour market after some years of absence. Also important in many countries is the rapid increase in the number of single-parent families economically supported by women. This quantitative change in participation, however, has not been accompanied by a qualitative change, in the type of work open to women. The disappearance or diminution of the traditional women's occupations in agriculture and domestic service have been compensated for by the growth of new job opportunities. These are largely confined to the service industries and certain manufacturing industries. This segregation is even more marked when examined by occupation and by level of responsibility, as documented in Chapter I. There is as yet little indication that this pattern of employment is disappearing: indeed, in some countries there are signs that it is becoming more pronounced. As in days gone by, 'women's occupations' are still marked by lower wages, less security of employment, lower levels of skill, reduced opportunities for training and limited chances of advancement. In education, most countries have experienced a steep rise in female participation above compulsory school age, reflecting changed attitudes to careers. But here too, the activity of young women is concentrated in a few fields, and they are thus continually directed into the same overcrowded and limited number of occupations.

The persisting occupational and education segregation has several causes. One is the still widespread assumption that the main role of women always has been and still is, or ought to be, confined to that of wife and mother - a stereotype that corresponds less and less with reality. This assumption implied that the labour market activity of women was temporary and supplementary. Consequently, their needs in education, training and employment have been and often still are regarded as secondary, and their commitment to the labour market as less than whole-hearted. Entire industries have come to depend upon the availability of cheap and comparatively unskilled labour largely supplied by women. In general, despite a certain progressive evolution towards equal opportunity, women still occupy lower grades than men, earn less, benefit less from training, recurrent education and promotion, and frequently occupy the fringes of the labour market with limited recognition of their right to work. In addition, the pressing needs of women who combine gainful employment with family responsibilities are insufficiently met. Finally, social security systems continue in many cases to treat women as dependents, and derived rights bring them only reduced and partial benefits.

In the past these inequalities were not seriously questioned. Social and economic developments make them appear increasingly inequitable, for the roles of women and men are changing. As regards need for and commitment to gainful employment, there is no reason or justification for differentiating between men and women. Rising expectations and changing needs and circumstances have made economic activity normal and necessary for married women, just as for the unmarried and for those who, in increasing numbers, head single-parent families. As fully fledged workers, they have the right to have this status recognised in their opportunities for employment and their treatment within employment. But this has still to be achieved.

The costs of slow progress towards effective equality in employment must be recognised. They are both direct, for example in the need to provide financial support to individuals and families unable to achieve economic independence, and indirect, due to the loss of the productive and creative potentialities of women that are wasted. In the long run, the economic and social development of the whole of society stands to benefit from the effective use of all its human resources.

The recession inevitably complicates the achievement of equality and the full recognition of the right of women to work as full and permanent members of the labour force. Though economic conditions may delay solutions to the questions discussed in this report, delay only makes them more pressing. The conditions preventing

women from fulfilling their full productive capacities constitute a form of underemployment or hidden unemployment and a source of inefficiency, and thus contribute to the recession. All policies aimed at restoring full employment should also take account of the need to achieve equality between the sexes in the labour market.

Effective equality requires not only theoretical equality of access or opportunity, but also positive measures aimed at achieving a more balanced distribution of social and economic responsibilities and roles between men and women.

WOMEN IN EDUCATION AND TRAINING

The aim of policy in this field is to increase the participation of women in every branch and at every level of education and training so as to enable them to undertake a wider range of economic activity. Formal equality of access to education and training, though a necessary first step, is not enough to fulfil this intention. Barriers raised by convention, early education, segregated institutional structures and informal practice remain important. Behaviour is greatly influenced by role stereotypes, which the system itself may help to perpetuate. One result of the continuing inequality of education as it exists in practice is that girls are particularly hard hit by youth unemployment owing to the narrow range of their training.

In most Member countries, compulsory education makes male and female participation rates almost identical up to about fifteen years of age. Thereafter, differences in participation rates occur between Member countries. While participation is growing for both sexes, in higher education it stays markedly lower for women. Participation at this level leads most surely to life-long economic activity; thus the increase in the numbers of highly qualified women is an important element in creating pressure for equality in employment. In course choices, which have a major influence on employment patterns, differences between the sexes are striking. In both secondary and post-secondary education, women are concentrated in the humanities and traditionally "female" areas such as nursing, primary school teaching and secretarial work. Scientific, technical and managerial subjects remain almost exclusively masculine. In adult and recurrent education, a similar pattern continues, with women participating less in vocational courses, and even then preferring shorter courses providing more elementary qualifications.

At the PRIMARY SCHOOL level the principal task is to reduce the early influence of sex stereotypes. Governments might consider,

where appropriate, aiming for a more equal distribution of men and women teachers at this level by promoting the recruitment of men, making awareness of the problem of sex stereotyping a feature of teacher training for both women and men, and discouraging the reinforcement of sex-based attitudes in play and reading materials. From the early stages of their school careers, girls and boys should be aware of job possibilities and of the sharing of occupational and family roles.

Most career and further education choices are made at SECONDARY level. The lower female participation rate persisting in some countries, and the generally restricted range of subjects taken by girls, is an important element in later inequalities of employment. Among measures to be taken, governments should consider aiming at equal participation, where not yet achieved, of boys and girls beyond compulsory school age; ending sex segregation, where it persists, in educational institutions and in the curriculum; encouraging the recruitment of women teachers at this level; ensuring free access to all courses and aiming at balanced participation; discouraging early vocational choice through narrow selection of courses by providing counselling that encourages fuller participation of girls at the higher levels of secondary education, and urges girls and boys to consider venturing into non-traditional fields. Effective counselling may require training for teachers and the strengthening of links with advice and employment services outside the school, which will be in direct contact with the labour market.

At the POST-SECONDARY level the imbalance of male and female participation becomes pronounced, with direct effect on the later economic activity of women. Moreover, the unequal distribution of boys and girls between subjects at an earlier stage leads to the heavy concentration of women in certain fields with adverse effects on their employment and earnings opportunities. Where appropriate, the following measures should be considered: removing formal discrimination in admissions policies, and urging institutions to revise their practices where necessary to remove informal barriers; positive action, such as the establishment of targets for female participation, may be considered as a necessary supplement; information and counselling should be provided to encourage both men and women to enter non-traditional areas of study and training; alternative part-time and evening courses, particularly valuable to people with family responsibilities, should be provided or expanded.

ADULT AND RECURRENT EDUCATION AND TRAINING is of special importance. It provides the possibility for gaps in earlier education to be filled, thus corresponding to the needs of many who return to the labour market, especially after a long absence due, for example, to family responsibilities or prolonged unemployment.

It offers a second chance to those who wish to advance their careers but whose skills or knowledge may have become outdated or whose secondary education may not have been completed. If those who need this opportunity, especially those from disadvantaged sections of the population, are to derive full benefit from it, the system must be flexible enough to take account of their special circumstances. Decentralisation of facilities where necessary would permit easier access, as would assistance with expenses for travelling and materials used. Flexible admission requirements for those with employment or family experience, and where appropriate course credits, would widen the range of those able to benefit. "Distant education" by television, radio and correspondence can help those prevented from participating in more conventional schemes. Encouragement should be given to employers, where necessary in the form of training grants, to employ men and women in non-traditional occupations. Apprenticeships, at the moment almost entirely segregated by sex according to the vocational branches, should be made open to male and female candidates. Most important of all, encouragement should be given to women themselves to undertake training in non-traditional fields, by counselling, by enabling those with family responsibilities to train during working hours or to benefit from paid leave, and by providing training grants preferably higher than unemployment benefit and without reference to the spouse's income. General education as well as vocational courses may be needed by those trying to improve their position in the labour market, and who may need to make up their original secondary education.

Educational reforms cannot be effective by themselves in improving the position of women in the economy and society. Their success depends on, even as it contributes to, progress towards equality in pay and employment. However, the autonomy enjoyed by educational institutions may make them slow to respond to social change and the new needs it engenders. Positive action within the educational system is therefore necessary. This needs to extend to the whole field of education, for the different levels of the system are interdependent: opening up university, technical and training courses to women, for example, is of limited value without appropriate changes at secondary level, and vice versa. Similarly, adequate child-care facilities are vital to any attempt to increase the participation of adult women in education and training, as in the other activities outlined in this report.

ACHIEVING EQUALITY IN PAY AND EMPLOYMENT

Policies operating directly on labour market conditions lie at the heart of the overall strategy for achieving equal opportunity for women and men in the economy. During recent years, the concept of equality has evolved, as international instruments and national laws show. The principle of equality of remuneration including all payments and fringe benefits, for 'work of equal value', or work otherwise defined as equal, is becoming established. Most countries have laws in this field, and they, along with advances in the field of collective bargaining, have helped narrow the earnings gap between men and women, although great differences still exist. Equality of access to employment is the next step, involving not only the elimination of discrimination in advertising, recruitment, etc., but also equalisation of participation in every field of education and training, so as to make equal access to employment a reality. Equality of treatment within employment, in matters of promotion, training, job security and other benefits, is also being increasingly recognised as a right.

It is not enough to guarantee equality in principle or in theory. Even in the matter of equal pay, it has often proved difficult to raise the pay of women workers to that of their "male counterparts" because there are no exact male counterparts. Sometimes this has provided an excuse for inaction, and laws have needed to be drafted carefully so as to be sufficiently precise in their specifications for observance and wide in their application. But even aside from deliberate uncooperativeness, the differences between men's and women's occupations have meant that a large difference in earnings continues to exist even when equality of pay for work of equal value is established. In the wider field of employment too, theoretical guarantees against inequality have not proved enough, especially where no ostensible barrier against the employment or advancement of women exists. The concept of employment equality has therefore widened, so that the test of any employment policy is its result rather than its intent. Equal participation is the aim, and positive measures in recruitment, training and promotion are necessary to achieve it. This concept has already been embodied in the collective bargaining agreements or laws of certain countries.

Once such principles of equality are accepted, there remains the task of putting them into effect. Here national differences are great. Conditions do not permit the same procedures to be used in the same way in every country, and the priority given to the question of equality also differs. There are indications of convergence in

policy, partly in response to international recommendations. This is beneficial, for the different approaches can supplement each other when used simultaneously. Examination of the experience of Member countries enables identification of the main elements of an effective policy.

COLLECTIVE BARGAINING has brought about notable progress in several countries where it has been the principal instrument in increasing equality between the sexes. It enables significant advances to be made on a wide front, and can help to bring about a reduction of differentials of earnings between groups of workers, thus attenuating one of the bad effects of occupational segregation. It is flexible and can frequently and easily be up-dated. Collective agreements contain their own enforcement machinery, operated by employers, workers and their representatives, and by encouraging participation it can contribute to awareness of inequality and to changing attitudes.

To be fully effective, collective bargaining needs certain conditions that may not be fully present in all Member countries. Rapid progress may require strong employers' and workers' organisations, a higher degree of unionisation of women workers and the representation of their views at decision-making levels. This involves encouraging a more active participation of women in unions:

- by promotional campaigns in workplaces;

- by special measures by workers' organisations to increase the representation of women, for example, through training schemes and the provision of places for women at conferences and on decision-making committees.

Several countries have found it necessary to guarantee by law that certain principles (such as equal pay) are observed in collective agreements, or even to induce employers and unions to formulate their own positive equality measures.

A profound change in the roles of men and women requires changes in attitudes throughout society. The work of EDUCATION, MONITORING AND MORAL SUASION is therefore essential. Many governments have set up special commissions, for example on women's employment, or other units for this purpose, which are able to combine with the function of coordination of government policy in different fields, monitoring and research into specific problems and areas.

Most countries are adopting or have adopted LAWS ON EQUAL PAY AND EMPLOYMENT. Their importance as an element of policy varies. In some Member countries they are a supplement to the more important action carried out through collective bargaining. In others, the law is the most important policy instrument. It has the advantage of helping those who are not organised, and, being of

universal application, it fills gaps that might be left by collective bargaining or voluntary action. Legal regulation can have a beneficial effect on hiring practices and also provide a basis for positive action to widen recruitment, training and promotion opportunities. The law is most easily applicable to identifiable instances of discrimination where women and men work together in the same industries and in similar occupations.

In certain countries, problems of delay and expense have arisen, and sometimes workers have been reluctant to make use of the legal machinery. These experiences have shown the need for an efficient enforcement mechanism, both to deal with individual complaints and to supplement them by taking the initiative through action on a wider scale. Where such problems have occurred, the following features have proved desirable:

- strong back-up legislation and an effective administering body, so as to encourage compliance and conciliation;

- a speedy and informal conciliation procedure, with the direct participation of the complainant where possible;

- screening of complaints so that the kind of action necessary can be decided quickly;

- protection from victimisation.

TIME ARRANGEMENTS

Increasing the flexibility of work schedules is an important element in improving the quality of life for the individual, the family and the community. At present, difficult problems are created for employed parents by the conflicting demands made upon their time by rigid work schedules and family responsibilities. Women's employment suffers most seriously, as very often even when working outside the home they are expected to bear most of the burden of caring for the family. Improved time arrangements could make possible a better redistribution of family obligations between its members. A more flexible arrangement of time would offer particular benefits to many others, such as students, the elderly and those undergoing retraining, and indeed would offer advantages to all workers as an element in humanising conditions of work.

In the short term, time flexibility can help individuals and remove certain obstacles to equal opportunity, but it is not in isolation a means towards equality of the sexes. Indeed, there is a danger that it would be seen as a means for enabling women to continue their traditional role in the family at the same time as they work in the labour force, without any significant redistribution of family responsibilities between the sexes, and thus would not ease their double burden. For this reason, it is important to make all the provisions of time flexibility, particularly

those connected with the performance of family responsibilities, available both to men and women, so as to enable these responsibilities to be more fully shared. In this way, taken in conjunction with the evolution of attitudes regarding sex roles, and all the policies discussed here for integrating women more fully into the labour market, the various alternative time arrangements, including the shortening of daily working hours, can be regarded as one element in an equality strategy.

Two important aspects of the question are part-time employment and life-long alternation of paid and unpaid activity.

PART-TIME EMPLOYMENT is an area of growing importance. The advantages it could offer to certain workers are however far from being realised. A distinction must be made between involuntary part-time employment, which is merely a form of underemployment, performed by those who cannot find full-time employment or who are prevented from taking it because of lack of adequate child care, and voluntary, regular part-time employment carried out during a significant number of hours per week. Even in the latter case, the present position of part-time workers is unsatisfactory in several respects. Most openings occur in relatively unskilled occupations. Rates of pay are frequently low. Opportunities for training and promotion are limited. Part-time workers in many countries are not covered by protection of employment legislation or social security. Persons unable to take full-time employment may have no choice but to accept these conditions especially at a time of high unemployment. Governments might consider the following remedial measures.

(1) To extend social security benefits to regular part-time workers on a <u>pro rata</u> basis where this has not already been done. These will include sickness and leave benefits and pension rights. Employers and trade unions should be encouraged to include part-time workers in the arrangements for private pension schemes and other fringe benefits, and in the accumulation of seniority rights.

(2) To ensure the same protection of employment as for full-time workers, for example in time of recession or after periods of leave (maternity, sickness, etc.).

There are many possible reasons why workers may wish or be obliged to alternate between paid and unpaid activity at some time during their lives. A common reason in the case of women is the need to devote themselves full time to the care of their families, especially when child care is insufficient. Other motives might be the desire to extend education or training. It is clearly undesirable that a decision to interrupt gainful employment based on such grounds should entail serious financial loss, as is now frequently the case, particularly with regard to eligibility for social security benefits.

Governments might consider appropriate action in three areas. First, workers could be helped to reenter the labour market after a period of absence by counselling and retraining schemes, and by financial support while seeking new employment. Second, reemployment after a certain period of paid or unpaid leave could be guaranteed. Third, the social security cover of those who have given up employment voluntarily for a certain period could be maintained, and their rights to long-term benefits such as pensions secured. Such opportunities should be equally open to men and women. Especially when children are small, or during critical periods such as prolonged illness, the welfare of the family may require the support and presence of both parents.

Properly used, flexible time arrangements could have economic and social benefits for the individual, the family and the community, and, by equalising the continuity of employment of men and women, be a move towards a more balanced sharing of roles.

CHILD CARE FOR WORKING PARENTS

The main responsibility for the care of children is usually borne by women, whether or not they work outside the home. The constraints that this tends to impose on their labour market activity is an important cause of their inequality of access to employment. Women with gainful activities are generally still obliged to combine the two roles. It may be that changes in public attitudes that will accompany the growing economic activity of women will lessen this burden, as fathers assume a greater share of the tasks traditionally ascribed to mothers. Such changes will take time. But, however much wider sharing of family responsibilities and more flexible time arrangements and career patterns may do to assist women to increase the range of their activities without undue strain on themselves and their children, adequate child care arrangements will remain essential. The Working Party emphasises that the upbringing of children is a social function, and consequently the responsibility not of the parents alone, but of society as a whole, in the interests of the children, the parents and the future of the community.

. In spite of the shortage of child care facilities, especially for young children, the number of mothers of pre-school age children who remain in employment has continued to increase rapidly. Some countries have made it an aim of policy to facilitate this trend. Others prefer to encourage the mother to remain at home at least during her children's early years, by the granting of extended leave and financial aid. Most countries have a combination of the two.

Whatever the details of public policy, the demand for child care places, outstripping facilities, generally requires a system of priorities to be adopted, allocating children on grounds of need.

For the care of young children, it is desirable that all parental leave, for care of infants and in case of child sickness, should be equally available to both parents, for the sake both of the family and of each parent's employment chances.

Although differences between countries are marked, some provision of care outside the home for children of a few months old is recognised to be necessary. Otherwise, the care of children whose mothers are obliged to undertake gainful employment would in some cases be seriously inadequate. The large increase in the number of families headed by a single parent is an important factor in obliging them to be employed irrespective of the adequacy of available child care.

The alternative forms of child care remain a subject of discussion as regards their respective advantages and disadvantages in terms of quality, availability, cost, etc. (1). With all forms of child care it is important to ensure not only that the physical and psychological security of the child is safeguarded, but also that adequate mental stimuli are given. In the past, custodial care has been emphasised, and a widening of the training of day-care centre staff, and particularly of child minders, would be of advantage.

A serious problem for the gainfully employed parents of immediately pre-school and school-age children is the lack of care facilities outside school and kindergarten hours and during holidays. Organised after-school care is a need poorly met in all countries. Makeshift solutions are frequently necessary, including that of allowing children to fend for themselves. Several solutions should be considered. Older children could attend day centres after school, though with day care places already short, the difficulties are obvious. Supervised playgrounds could be provided. Facilities for extracurricular activities could be attached to the schools. Existing child-minding services could be used after school by older children. This might prove not only quicker to provide and cheaper to run, but also provide continuity of care from pre-school days. Its encouragement by subsidies or tax allowances should be considered.

School holidays too pose problems, especially for poorer parents. Some organised care is provided in the form of residential summer camps available on a rotating basis for part of the vacation, and

(1) These questions are discussed in detail above, pp. 127 - 163.

similar facilities. None of these provide complete coverage, however, and some involve considerable expense. Most of the burden is therefore carried by relatives or neighbours. When none of these solutions are possible, some mothers may even be obliged to leave their jobs.

Although these and other child care facilities are usually offered first to those with special needs (for example, single-parent families) access is effectively limited by cost, transport problems, hours and days of operation, and to some extent by the socio-economic and cultural background of parents. Consequently, a disproportionate number of the limited places may be occupied by children of middle-class families.

In the interests of children, families and the economy, as well with the aim of enabling parents to fully exercise their right to work, the Working Party urges that child care should be given a high priority when scarce resources are allocated.

SOCIAL SECURITY

Changing patterns of living and evolving attitudes, according to which equality of treatment of the sexes is seen as a matter of equity, as well as changing patterns of economic and social life, have created new needs that social security systems are rarely designed to meet. They were in most countries based on the traditional family pattern in which the income was mainly provided by the husband and in which the wife was considered as a dependent, along with children and the infirm. Social security rights were in such systems derived from the husband and in many cases were conditional on continuing marital status. In the case of wives employed outside the home, both earnings and autonomous social security rights were considered as merely supplementary. The assumptions on which this model was based can no longer be considered valid: the more important economic activities now pursued by women, the responsibilities incurred by them in their own right and the greater fluidity of marriage relationships are all altering the conception of rights incorporated in existing social security systems.

The problem regarding women's autonomous rights to benefits is that they are often inadequate owing partly to interruptions in employment due to home responsibilities. This may directly affect benefit levels, as well as limiting job prospects and earnings, thus doubly reducing the amount payable in earnings-related pension schemes.

The main practical problem of derived rights is that they are no longer secure or, in many cases, sufficient. This is clearest in

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the case of marriage breakdown, which may be a financial disaster for women who have worked little outside the home: their only social security rights, those derived from the ex-husband, may be lost. Pension rights in such cases are a particular problem in some countries, though remedial action has been or is now being taken in a number of Member countries.

In general, the two principal aims of social security - assured and adequate coverage and fair return for work performed - are not being satisfactorily fulfilled with regard to certain groups of women: especially low-paid workers, some divorcees, some widows and others. The principal areas of need still existing in certain countries are in employment, for women are not eligible, in many systems, for financial or other aids to reenter the labour market after an absence, for example for family reasons, or for unemployment benefit if they leave the labour market 'voluntarily'; in the matter of family responsibilities (leave and allowances); in case of accident and illness of women caring for children in the home; in case of marriage breakdown or widowhood, when rights derived from the former husband may be inadequate or vulnerable; and after retirement, when pensions may be low due to employment inequality and/or the incomplete protection given by derived rights.

The first step is to eliminate not only overt discrimination on a basis of sex where it still exists, but also the covert discriminatory effects of systems. Some restrictive conditions for the payment of benefits are still applied to women and not to men; there are differences in pension provision, especially in the private sector. Attention also needs to be given to the question of the right to benefits for periods spent outside paid employment.

Many of the problems referred to, however, do not stem from shortcomings in details of the systems themselves, and cannot be remedied by administrative or legislative measures. The fundamental cause is the inferior position in the economy occupied by women as a group. Low earnings, limited career opportunities, a generally lower level of career-oriented education and the handicaps imposed by family responsibilities under present circumstances lead inevitably to this result when benefits are related to earnings and contributions. However desirable certain modifications in social security provisions may seem, permanent solutions to some of the greatest problems depend on progress being made in the other fields analysed in this report, so as to create the economic and social conditions in which women can effectively benefit from equal rights.

In the meantime, the following points should be considered where appropriate:

- the provision, if not already assured, of adequate minimum benefits (particularly pensions) as short-term assistance to those

whose derived and/or autonomous rights provide inadequate benefits in non-universal systems;

- the alteration of methods of calculation of earnings-related benefits so as not to penalise the low-paid and those with work records interrupted by caring for children in the home;

- arrangements to guarantee rights in the case of marriage termination, by splitting of the combined contribution record of the spouses or other means;

- the extension of benefits (unemployment, sickness) pro rata to regular part-time and other workers who are at present excluded;

- the introduction, where necessary, of more equitable means of closing the gaps in contribution records caused by prolonged interruptions in employment;

- the calculation of pensions and their reversibility in case of death on the same basis for women and men.

These are essentially transitional measures intended to improve equity and respond to economic needs arising during the stage between economic dependence and economic independence for most women.

IN CONCLUSION

The unprecedented influx of women, particularly married women, into the labour force on what clearly appears to be a permanent basis, radically changing the sex composition of the working population, creates a challenge to industrial societies. Women workers now form a substantial proportion of the total working population although they are still concentrated in a few occupations. It is obvious that the human potential and social investment represented by this growing element of the labour force is not being fully utilised. Human resources are being wasted in a way in which few other resources are wasted in an efficient industrial society. It is essential that in the interests of economic efficiency, as well as increased social well-being, government policy should place greater emphasis on responding to changes in our contemporary economies which have altered the composition of the labour force.

Since a primary function of OECD is to provide scientific and objective analyses of structural, social and economic changes, the implications of the major changes in the role of women in the labour force will be one of the Organisation's major concerns. Women already play and will continue to play a major part in the functioning of labour markets and other aspects of our economies. OECD must therefore apply to the female part of the labour force

the same principles and objectives it has adopted with regard to the labour force in general: to create and maintain "employment and improved conditions of working life for all those who are able and want to work, with the support of relevant economic, employment, manpower and social policies" and "more equity in the distribution of employment opportunities and income"(1).

This is the long-term perspective conclusion of the first report in implementation of the mandate of the Working Party: the coordination of social and economic policies is the first condition of success. Wider job opportunities necessitate a more effective system of education and vocational training; conversely, education is of limited effect if the employment and career opportunities which would enable women to use it are lacking and if equal pay for work of equal value is far from being a reality. Similarly, if new opportunities are to be fully exploited without undesirable effects on future generations, account must be taken of the special needs of working parents when formulating work schedules, conditions of employment (part-time job security, maternity and parental leaves, etc.) and child care policies.

The matters that have been studied in this report represent only the basic, necessary onnditions of the exercise by women of their expanding role in the labour force. There are other matters of real concern that will require further study if the obstacles to full economic opportunity for women are to be removed.

(1) Recommendation of the Council on a General Employment and Manpower Policy (5th March, 1976).

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(81 79 02 1) ISBN 92-64-11904-3

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